

# FOREWORD

The Grantville Redevelopment Project Draft EIR was circulated for public review for a period of 64 days extending from December 13, 2004 to February 14, 2005. The Draft EIR was distributed to a variety of public agencies and individuals.

In accordance with CEQA Guidelines Section 15088, the City of San Diego Redevelopment Agency has evaluated the comments on environmental issues received from those agencies/parties and has prepared written responses to each pertinent comment relating to the adequacy of the environmental analysis contained in the Draft EIR. There has been good faith, reasoned analysis in response to comments, rather than conclusionary statements unsupported by factual information.

The agencies, organizations, and interested persons listed on the Response to Comments Index submitted comment on the Draft EIR during the public review period. Each comment submitted in writing is included, along with a written response where determined necessary. The individual comments have been given reference numbers, which appear to the left of the corresponding comment. For example, the first letter, from the State of California, Governor's Office of Planning and Research, State Clearinghouse has comment number OPR1, with additional comments to a letter, numbered consecutively.

In response to comments received, certain revisions have been made in the EIR. These revisions to the EIR are generally minor text changes that do not constitute significant additional information that changes the outcome of the environmental analysis or require recirculation of the document (Guidelines Section 15088.5). All such changes are noted in the responses to comments.

The comment letters and responses are provided on the following pages.

# Index of Comments on Draft EIR & Responses

Commentor	Date	Response Series
<b>Federal Agencies</b>		
U.S. Fish and Wildlife Service (joint letter w/DFG)	February 14, 2005	DFG1 – DFG19
<b>State Agencies</b>		
Governor's Office of Planning and Research (OPR) – State Clearinghouse and Planning Unit	January 27, 2005	OPR1
Department of Conservation	January 12, 2005	DOC1
Native American Heritage Commission	January 26, 2005	NAHC1 – NAHC3
Department of Transportation	January 25, 2005	DOT1 – DOT6
San Diego County Office of Education	February 2, 2005	DFG1 – DFG19
Department of Fish and Game (joint letter w/USFWS)	February 14, 2005	COE1 – COE2
<b>Local Agencies</b>		
San Diego Association of Governments (SANDAG)	February 14, 2005	SNDG1 – SNDG4
City of San Diego – Development Services Department (Ann French Gonsalves- Traffic)	February 14, 2005	AG1 – AG6
City of San Diego – Park Planning and Development, Park and Recreation Department	January 26, 2005	PRD1 – PRD23
<b>Organizations</b>		
Tierrasanta Community Council	February 14, 2005	TCC1 – TCC13
<b>Individuals</b>		
Daniel Dallenbach – Valley View Properties	January 19, 2005	DD1 – DD13
Richard McCarter – California Neon Products	January 31, 2005	RM1 – RM6
Brian R. Caster – Caster Properties, Inc.	February 9, 2005	BC1 – BC8
Daniel R. Smith - El Dorado Properties	January 25, 2005	DRS1 – DRS29
Charles Little – Letter A	January 24, 2005	CLA1 – CLA9
Charles Little – Letter B	February 1, 2005	CLB1 – CLB8
Lynn Murray	February 8, 2006	LM1 – LM7
Jennifer Nickles	February 2, 2005	JN1 – JN14
Holly Simonette – Letter A	February 14, 2005	HSA1 – HSA32
Holly Simonette – Letter B	January 25, 2005	HSB1 – HSB7
Holly Simonette/Lynn Murray	January 2005	HSLM1 – HSLM8
Don Stillwell – Letter A	January 31, 2005	DSA1
Don Stillwell – Letter B	February 8, 2005	DSB1
Helen R. Hunter	February 14, 2005	HH1 – HH6
Marilyn Reed	February 13, 2005	MR1 – MR9
Lee Campbell	February 14, 2005	LC1 – LC77
Betty Torre	February 14, 2005	BT1 – BT5
<b>Public Meetings</b>		
Redevelopment Agency Hearing Transcript	January 25, 2005	RB1 – RB3, JR1 HS1 – HS6, DS1, JS1 – JS2, DF1 – DF4
Grantville Redevelopment Area Committee Minutes	January 31, 2005	
<b>Petition</b>		
San Diego River Conservancy	March 13, 2005	SDRC1 – SDRC40

*This page intentionally left blank.*



Arnold  
Schwarzenegger  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse and Planning Unit



Jan Boel  
Acting Director

January 27, 2005

Mr. Tracy Reed  
City of San Diego Redevelopment Agency  
600 B Street, Fourth Floor  
MS 904  
San Diego, CA 92101

Subject: Grantville Redevelopment Project  
SCH#: 2004071122

Dear Mr. Tracy Reed:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on January 26, 2005, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

OPR1

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Terry Roberts  
Director, State Clearinghouse

Enclosures  
cc: Resources Agency

**RESPONSE TO COMMENT LETTER FROM THE STATE OF CALIFORNIA,  
GOVERNOR'S OFFICE OF PLANNING AND RESEARCH, STATE  
CLEARINGHOUSE, SIGNED BY TERRY ROBERTS, DATED FEBRUARY 14, 2005**

**Response to Comment OPR1:**

This letter acknowledges that the City of San Diego Redevelopment Agency has complied with the State Clearinghouse public review requirements for the Grantville Redevelopment Project Draft Program EIR.

The statutorily required Draft EIR public review period is 45 days. The original 45-day public review period for the Grantville Redevelopment Project Draft Program EIR extended from December 13, 2004 to January 31, 2005. However, the City extended the public review period to February 14, 2005. The total public review period was 64 days.

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2004071122  
**Project Title** Grantville Redevelopment Project  
**Lead Agency** San Diego, City of

**Type** EIR Draft EIR  
**Description** Adoption of a redevelopment project area to promote land use, improve traffic flow, parking, and services, and eliminate physical and economic blight.

**Lead Agency Contact**

**Name** Mr. Tracy Reed  
**Agency** City of San Diego Redevelopment Agency  
**Phone** 619-533-7519 **Fax**  
**email**  
**Address** 600 B Street, Fourth Floor  
 MS 904  
**City** San Diego **State** CA **Zip** 92101

**Project Location**

**County** San Diego  
**City** San Diego  
**Region**  
**Cross Streets** Friars Road, Mission Gorge Road  
**Parcel No.** Various  
**Township** **Range** **Section** **Base**

**Proximity to:**

**Highways** I-15, I-8  
**Airports** None  
**Railways** None  
**Waterways** San Diego River  
**Schools** Five  
**Land Use** Commercial, office, industrial, parks, open space, community facilities, and mining.

**Project Issues** Agricultural Land; Air Quality; Archaeologic-Historic; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Growth Inducing; Landuse; Cumulative Effects; Aesthetic/Visual

**Reviewing Agencies** Resources Agency; Department of Conservation; Department of Fish and Game, Region 5; Department of Water Resources; Department of Parks and Recreation; California Highway Patrol; Caltrans, District 11; Department of Housing and Community Development; Native American Heritage Commission; Department of Toxic Substances Control; Regional Water Quality Control Board, Region 9; Integrated Waste Management Board

**Date Received** 12/13/2004 **Start of Review** 12/13/2004 **End of Review** 01/26/2005

Note: Blanks in data fields result from insufficient information provided by lead agency.



DIVISION OF OIL,  
GAS, & GEOTHERMAL  
RESOURCES

■ ■ ■

5816 CORPORATE AVE.  
SUITE 200  
CYPRESS  
CALIFORNIA  
90630-4731

PHONE  
714/816-6847

FAX  
714/816-6853

INTERNET  
consrv.ca.gov

■ ■ ■

ARNOLD  
SCHWARZENEGGER  
GOVERNOR

DEPARTMENT OF CONSERVATION  
STATE OF CALIFORNIA

RECEIVED

JAN 18 2005

COMMUNITY & ECONOMIC DEV  
DEPARTMENT

January 12, 2005

Mr. Tracy Reed  
City of San Diego Redevelopment Agency  
600 B Street, Fourth Floor, MS904  
San Diego, California 92101

Subject: Draft Environmental Impact Report for the Grantville  
Redevelopment Project, SCH#2004071122

Dear Mr. Reed:

The Department of Conservation's (Department) Division of Oil, Gas, and Geothermal Resources (Division) has reviewed the above referenced project. The Division supervises the drilling, maintenance, and plugging and abandonment of oil, gas, and geothermal wells in California.

The proposed project is located beyond the administrative boundaries of any oil or gas field. There are no oil, gas, or injection wells within the boundaries of the project. However, if excavation or grading operations uncovers a previously unrecorded well, the Division district office in Cypress must be notified, as the discovery of any unrecorded well may require remedial operations.

Thank you for the opportunity to comment on the Draft Environmental Impact Report. If you have questions on our comments, or require technical assistance or information, please call me at the Cypress district office: 5816 Corporate Avenue, Suite 200, Cypress, CA 90630-4731; phone (714) 816-6847.

Sincerely,

Paul Frost  
Associate Oil & Gas Engineer

RESPONSE TO COMMENT LETTER FROM THE DEPARTMENT OF  
CONSERVATION, STATE OF CALIFORNIA, SIGNED BY PAUL FROST, DATED  
JANUARY 12, 2005

**Response to Comment DOC1:**

Comment noted. The Draft Program EIR addresses the adoption of a redevelopment project area; no specific development is proposed at this time. Future redevelopment activities would comply with federal, state, and local agency disclosure requirements in the event a previously unrecorded well is encountered during grading of any future redevelopment project.

DOC1

STATE OF CALIFORNIA  
Governor

Arnold Schwarzenegger

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364  
SACRAMENTO, CA 95814  
(916) 653-4082  
(916) 657-5390 - Fax



January 26, 2005

Mr. Tracy Reed  
City of San Diego Redevelopment Agency  
600 B St., Fourth Floor, MS 904  
San Diego, CA 92101

Re: DEIR, Grantville Redevelopment Project  
SCH# ~~2004061122~~ 2004071121

Dear Mr. Reed:

Thank you for the opportunity to comment on the above-mentioned document. In order to enable the Commission to verify that your project will not impact a site recorded on the Native American Heritage Commission's Sacred Lands File, please provide us with the following information:

✓ Please provide U.S.G.S. location information for the project site, including Quadrangle, Township, Section, and Range.

Early consultation with tribes in your area is the best way to avoid unanticipated discoveries once a project is underway. Enclosed is a list of Native Americans individuals/organizations that may have knowledge of cultural resources in the project area. The Commission makes no recommendation of a single individual or group over another. Please contact all those listed; if they cannot supply you with specific information, they may be able to recommend others with specific knowledge. By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe or group. If you have not received a response within two weeks' time, we recommend that you follow-up with a telephone call to make sure that the information was received.

Lack of surface evidence of archeological resources does not preclude the existence of archeological resources. Lead agencies should consider avoidance, as defined in Section 15370 of the CEQA Guidelines, when significant cultural resources could be affected by a project. Provisions should also be included for accidentally discovered archeological resources during construction per California Environmental Quality Act (CEQA), Public Resources Code §15064.5 (f), Health and Safety Code §7050.5; and Public Resources Code §5097.98 mandate the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery and should be included in all environmental documents. If you have any questions, please contact me at (916) 653-6251.

Sincerely,

Carol Gaubatz  
Program Analyst

Cc: State Clearinghouse

RECEIVED

FEB 03 2005

STATE CLEARING HOUSE

clear  
1:26:05  
late

RESPONSE TO COMMENT LETTER FROM THE NATIVE AMERICAN HERITAGE COMMISSION, STATE OF CALIFORNIA, SIGNED BY CAROL GAUBATZ, DATED JANUARY 26, 2005

Response to Comment NAHC1:

Comment noted. The project area is located in Township 16S, Range 2W in an unsectioned part of the City of San Diego. It is located on the USGS 7.5' La Mesa quadrangle. A more detailed verbal description of the boundaries of the three sub-areas is provided in EIR sections Executive Summary and Project Description, as well as on page 1 of the cultural resources report provided in EIR Volume II Appendix E. Figures ES-1, and 3-2, and cultural resources report pages 1 and 2 provide location maps of the project area.

The proposed project is the adoption of a redevelopment project area; no specific development is proposed at this time. Mitigation Measure CR1 (EIR, page 4.5-5), requires the implementation of measures that address the potential presence of cultural resources, prior to subsequent redevelopment activity in the Project Area. Cultural resources reports prepared for future redevelopment activities would need to comply with City of San Diego Cultural Resource Guidelines.

Response to Comment NAHC2:

ASM Affiliates conducted Native American Consultation as described on page 22 of the cultural resources report (EIR Appendix E). A letter was sent to Ms. Gaubatz and she responded with a list of organizations and individuals to contact. ASM Affiliates then contacted each of the Native American contacts requesting information regarding traditional cultural properties in the project area. The letters were followed by a phone call. Appendix B of the cultural resources report (EIR Appendix E) provides copies of the Native American consultation letters. Native American consultation will be conducted as necessary as part of future cultural resource evaluations for specific redevelopment activities in the Project Area.

Response to Comment NAHC3:

The comment is acknowledged. As indicated by this comment, the EIR recognizes that lack of surface evidence of archaeological resources does not preclude the existence of archaeological resources. The City of San Diego has developed a detailed protocol to be followed in the event of accidental discoveries during construction, which would be followed as part of any subsequent redevelopment activities in the Project Area. Mitigation Measure CR1 (EIR, page 4.5-5) requires, "Any proposed development which may disturb subsurface soils, including removal of existing buildings or construction activities located adjacent to the San Diego River, shall include archaeological monitoring."

**RESPONSE TO COMMENT LETTER FROM THE NATIVE AMERICAN HERITAGE COMMISSION, STATE OF CALIFORNIA, SIGNED BY CAROL GAUBATZ, DATED JANUARY 26, 2005 (cont.d)**

**Response to Comment NAHC3 (cont'd.):**

Additionally, Mitigation Measure CR1 requires that avoidance be considered for significant sites. Mitigation Measure CR1 (EIR, page 4.5-5) requires, "Alternative options for significant sites under the City of San Diego and CEQA Guidelines can include: 1) avoidance, and preservation, or 2) mitigation of impacts from proposed development through completion of a data recovery program in compliance with CEQA Guidelines."

Project specific cultural resource recommendations are not made in the EIR as specific redevelopment activities and cultural resource impacts are not known. Detailed recommendations for mitigation would be made as appropriate depending on the type and extent of cultural resources potentially impacted. Subsequent redevelopment activities will be reviewed for potential impacts to cultural resources and will be required to comply with mitigation measures identified in the Program EIR as well as applicable measures based on site-specific cultural resources studies for subsequent redevelopment activities.



**Native American Contacts**  
**San Diego County**  
**January 26, 2005**

Barona Group of the Capitan Grande  
 Rhonda Welch-Scalco, Chairperson  
 1095 Barona Road Diegueno  
 Lakeside , CA 92040  
 (619) 443-6612

Jamul Indian Village  
 Leon Acevedo, Chairperson  
 P.O. Box 612 Diegueno/Kumeyaay  
 Jamul , CA 91935  
 (619) 669-4785  
 Fax: (619) 669-4817

Barona Group of the Capitan Grande  
 ATTN: David Baron  
 1095 Barona Road Diegueno  
 Lakeside , CA 92040  
 (619) 443-6612

Kumeyaay Cultural Historic Committee  
 Ron Christman  
 56 Viejas Grade Road Diegueno/Kumeyaay  
 Alpine , CA 92001  
 (619) 445-0385

Barona Group of the Capitan Grande  
 Steve Banegas, Cultural Resources Coordinator  
 1095 Barona Road Diegueno  
 Lakeside , CA 92040  
 (619) 443-6612

Kumeyaay Cultural Repatriation Committee  
 Steve Banegas, Spokesperson  
 1095 Barona Road Diegueno/Kumeyaay  
 Lakeside , CA 92040  
 (619) 443-6612  
 (619) 443-0681 FAX

Barona Group of the Capitan Grande  
 ATTN: EPA Specialist  
 1095 Barona Road Diegueno  
 Lakeside , CA 92040  
 (619) 443-6612

San Pasqual Band of Mission Indians  
 Allen E. Lawson, Chairperson  
 PO Box 365 Diegueno  
 Valley Center , CA 92082  
 (760) 749-3200  
 (760) 749-3876 Fax

Coastal Gabrieleno Diegueno  
 Jim Velasques  
 5776 42nd Street Gabrielino  
 Riverside , CA 92509 Kumeyaay  
 (909) 784-6660

Santa Ysabel Band of Diegueno Indians  
 Johnny Hernandez, Spokesman  
 PO Box 130 Diegueno  
 Santa Ysabel , CA 92070  
 (760) 765-0845  
 (760) 765-0320 Fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resource assessment for the proposed DEIR, Grantville Redevelopment Project, SCH# 2004071122, San Diego County.

**Native American Contacts**  
San Diego County  
January 26, 2005

**Sycuan Band of Mission Indians**

Danny Tucker, Chairperson

5459 Dehesa Road  
El Cajon, CA 92021

619 445-2613

619 445-1927 Fax

Diegueno/Kumeyaay

**Viejas Band of Mission Indians**

Anthony Pico, Chairperson

PO Box 908  
Alpine, CA 91903

(619) 445-3810

(619) 445-5337 Fax

Diegueno/Kumeyaay

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resource assessment for the proposed DEIR; Grantville Redevelopment Project, SCH# 2004071122, San Diego County.

## DEPARTMENT OF TRANSPORTATION

DISTRICT 11  
P. O. BOX 85406, MS 50  
SAN DIEGO, CA 92186-5406  
PHONE (619) 688-6954  
FAX (619) 688-4299  
TTY (619) 688-6670



*Flex your power!  
Be energy efficient!*

January 25, 2005

11-SD-8  
PM 6.3

Mr. Tracy Reed  
City of San Diego Development Agency  
600 B Street, 4<sup>th</sup> Floor, MS 904  
San Diego, CA 92101

Dear Mr. Reed:

DEIR – Grantville Redevelopment Project – SCH 2004071122

The California Department of Transportation (Caltrans) District 11 has the following comments:

- Several of the State intersections analyzed are improperly coded (Technical Appendix B) and hence under report predicted LOS. For example:

Intersection #1 Interstate 15 (I-15) SB ramps at Friars Road: The SB approach is coded as two left turns and a dedicated right. In fact, the existing SB off ramp is only two lanes with a dedicated left and combination left/right turn lane. Only the last hundred feet or so widens to accommodate a free right turn lane. In addition, this intersection is currently being reconstructed. The future scenarios (assuming no further improvements are made) should code the SB off ramp as two left turn lanes and two right turn lanes. Furthermore, a WB left turn lane is being added to accommodate SB I-15 traffic and the EB right turn lane that is currently free moving will now be signal controlled.

Intersection #12 Interstate 8 (I-8) WB off at Camino del Rio North/Alvarado Canyon Road: The SB left turn is coded as only one lane. In fact, there are two left turn lanes here. However, this should not affect predicted LOS much.

Intersection #14 I-8 EB off at Fairmount: The EB right turn is coded as a free right turn. In fact, this move is signal controlled as it conflicts with the SB through movement. This results in a serious underreporting of LOS, particularly in the pm peak.

- The report does not address the signalized intersection of I-8 EB ramps and Waring Road. This intersection has been reconstructed due to trolley impacts and signalized. Since it falls clearly within sub area A, and is most influenced by the proposed development of sub area C, it should probably be analyzed.
- Although identified improvements are contingent upon specific development, the document states as a project objective, to "improve the flow of traffic within the Redevelopment Project Area and otherwise enhance the quality of pedestrian and vehicular mobility" [3.4.1 (3)]. The community plan proposes to add approximately 17,000 daily trips above the no-build alternative in the horizon year and the alternative plan project, 19,000 daily trips above the no-build alternative on Fairmount Avenue in the vicinity of the I-8 interchange (tables 6a and 6b respectively of appendix B).

*"Caltrans improves mobility across California"*

## RESPONSE TO COMMENT LETTER FROM THE DEPARTMENT OF TRANSPORTATION, STATE OF CALIFORNIA, SIGNED BY MARIO H. ORSO, DATED JANUARY 26, 2005

### Response to Comment DOT1:

**Intersection #1.** A field review indicates that the southbound approach at Interstate 15 (I-15) and Friars Road has a right turn lane approximately 300 feet in length, which provides ample storage capacity for right-turning vehicles to turn right without being blocked by the left-turning vehicles. The additional improvements to this intersection (future scenarios of the southbound ramp as two left turn lanes and two right turn lanes, as well as the addition of a westbound left turn lane) as identified by the commentor would improve traffic LOS at this location beyond the LOS that is assumed. As such, the traffic analysis is considered conservative (worst-case).

**Intersection #12.** Comment noted. Because the existing Interstate 8 westbound offramp at Camino del Rio North/Alvarado Canyon Road actually contains two left turn lanes, whereas only one left turn lane is assumed in the traffic study, the analysis is considered conservative (worst-case). As noted by the commentor, the existence of the second left turn lane at this location should not affected predicted LOS significantly.

**Intersection #14.** The eastbound movement reference by the commentor is misrepresented in the figure depicting this intersection location configuration; however, the analysis is based on a signal that has three eastbound right-turn lanes, which corresponds to existing conditions.

### Response to Comment DOT2:

Interstate 8 eastbound ramps at Waring Road were under construction at the time of the preparation of the traffic analysis, and therefore were not included in the analysis. However, the improvements would improve LOS in the area, and are based on traffic improvement recommendations as analyzed in the Mission Valley East Corridor Project Final Environmental Impact Statement (FTA, MTDB, June 1998). Project Area intersections analyzed in the FEIS included Fairmount Avenue/Camino Del Rio North-Alvarado Canyon Road, Fairmount Avenue/Mission Gorge Road, Mission Gorge Road/Mission Gorge Place, Waring Road/Adobe Falls Road. As stated by the commentor, the I-8 eastbound ramps/Waring Road intersection is most influenced by Subarea C. Subarea C is currently developed with a commercial center, school and park. It is not likely that the school and park would be redeveloped; however, the commercial center may be revitalized. Pursuant to City of San Diego Traffic Impact Analysis Guidelines, a traffic impact study would be required for any future redevelopment within Subarea C (as well as the entire Project Area) for any project

**RESPONSE TO COMMENT LETTER FROM THE DEPARTMENT OF  
TRANSPORTATION, STATE OF CALIFORNIA, SIGNED BY MARIO H. ORSO,  
DATED JANUARY 26, 2005 (cont.d)**

**Response to Comment DOT2 (cont.d):**

that generates traffic greater than 1,000 total average daily trips, or 100 peak-hour trips if the project is consistent with the land use element of the community plan, or 500 total average daily trips, or 50 peak-hour trips if the project is not in conformance with the land use element of the community plan.

**Response to Comment DOT3:**

As the comment acknowledges, identified traffic improvements are contingent upon specific development and a project-level traffic analysis as required by City of San Diego Traffic Impact Analysis Guidelines. The EIR recognizes that existing and projected traffic conditions within and surrounding the Project Area currently, and will continue to exceed City LOS standards. However, no specific development is proposed. Appropriate mitigation at each impacted location will be analyzed on a project-by-project basis. Individual development will be required to evaluate environmental impacts and implement appropriate mitigation where necessary.

The Agency acknowledges and concurs that the problems associated with the Fairmount Avenue/Mission Gorge/I-8 interchange are of regional significance and will not likely be addressed absent a concerted redevelopment effort in the area. A primary purpose of the Grantville Redevelopment Plan will be to correct traffic circulation problems that impact the area and surrounding neighborhoods, and the subject interchange was included in the Redevelopment Project Area for that reason. The study, design and construction of improvements to the I-8 Interchange within the Project Area are included in the proposed Five-Year Implementation Plan. Absent the adoption of the Redevelopment Plan, it is unlikely that these problems will be addressed in the foreseeable future and thus they will continue to cause a significant safety and economic burden to the surrounding community.

**DOT3**  
(cont'd.)

In either case, the total volumes (approximately 80,000) will greatly exceed the capacity of the existing 4 lane major road and even if it is widened to 6 lanes. It is clear, that if the problems associated with the Fairmount Avenue/Mission Gorge /I-8 interchange are ever to be addressed, it should be through this redevelopment effort. The proposed redevelopment appears to be large enough to accommodate improvements of this type and should be recommended as project mitigation.

**DOT4**

- The report under section 4.2.3.5 "Horizon Year (Year 2030) Conditions" states that "No new CIP improvements are planned for the study area under both the existing and horizon year scenarios". Is the City not undertaking a relocation of Alvarado Canyon Road away from the I-8 WB off ramp as mitigation for the extension of Alvarado Canyon Road to Waring Road?

**DOT5**

- Caltrans supports "fair share" contributions as mitigation from developers for improvement due to cumulative traffic impacts from all proposed development projects. It is our recommendation that a coordinated effort between all interested parties be achieved in order to address ultimate transportation needs for future development.

**DOT6**

- The developer is responsible for quantifying the environmental impacts of any improvements (project level analysis) and completing all appropriate mitigation measures for the impacts. The indirect effects of any mitigation within Caltrans right of way must also be addressed. The developer will also be responsible for procuring any necessary permits or approvals for the regulatory and resource agencies for the improvements.

If you have any questions, please contact Jim Buksa, Development Review Branch, at (619) 688-6968.

Sincerely,



MARIO H. ORSO, Chief  
Development Review Branch

**RESPONSE TO COMMENT LETTER FROM THE DEPARTMENT OF  
TRANSPORTATION, STATE OF CALIFORNIA, SIGNED BY MARIO H. ORSO,  
DATED JANUARY 26, 2005 (cont.d)**

**Response to Comment DOT4:**

Several improvements associated with the Grantville Trolley extension were under construction at the time of the preparation of the traffic analysis. The relocation of Alvarado Canyon Road and the I-8 westbound off-ramp intersection does not change the HCM calculation of level of service and delay at any study intersection. However, there are no additional improvements identified in the City's CIP (Navajo's A-list, i.e., CIP) for the study area at this time.

**Response to Comment DOT5:**

Comment noted.

**Response to Comment DOT6:**

Comment noted.



U.S. Fish and Wildlife Service  
 Carlsbad Fish and Wildlife Office  
 6010 Hidden Valley Road  
 Carlsbad, California 92009  
 (760) 431-9440  
 FAX (760) 431-5902 + 9618



CA Dept. of Fish & Game  
 South Coast Regional Office  
 4949 Viewridge Avenue  
 San Diego, California 92123  
 (858) 467-4201  
 FAX (858) 467-4299

In Reply Refer To:  
 FWS-SDG-4185.2

Mr. Tracy Reed  
 City of San Diego Redevelopment Agency  
 600 B Street, Fourth Floor, MS 904  
 San Diego, California 92101

**FEB 14 2005**

Re: Draft Program Environmental Impact Report for the Grantville Redevelopment Project  
 (SCH# 2004071122)

Dear Mr. Reed:

The U.S. Fish and Wildlife Service (Service) and the California Department of Fish and Game (Department), collectively the "Wildlife Agencies," have reviewed the above-referenced Draft Program Environmental Impact Report (DEIR) for the Grantville Redevelopment Project in the City of San Diego (City), County of San Diego, California. The City distributed the DEIR to the Wildlife Agencies in December, 2004, as did the State Clearinghouse to the Department. However, neither the Service nor the Department has record of receiving the DEIR until February 3, 2005, and January 31, 2005, respectively, after BRG Consulting and the City sent us additional copies. We commented on the Notice of Preparation of the DEIR in a joint letter dated August 30, 2004. We appreciate the City's extension of the comment period for the DEIR to February 14, 2005.

**DFG1**

The San Diego Redevelopment Agency is pursuing a redevelopment plan to promote a variety of land uses, improve traffic flow, parking, and services in, and eliminate physical and economic blight from, the project area over a period of 30 years. This project is the adoption of a redevelopment plan to accomplish these goals. The area proposed for inclusion in the Grantville Redevelopment Project is located in the north eastern portion of the City, primarily within the Navajo Community Plan, but also includes portions of the Tierrasanta and the College Area. The San Diego River runs through most of the proposed redevelopment area.

**DFG2**

The Wildlife Agencies concur with statements in the DEIR that the project could result in significant impacts to biological resources such as sensitive habitats and listed and otherwise sensitive species. We are especially concerned about potential impacts on: (1) the San Diego River and associated wetland and riparian habitats; (2) the federally and state-listed and otherwise sensitive species that occur therein; (3) the Multiple Habitat Planning Area (MHPA) of the City's Multiple Species Conservation Program (MSCP); (4) wildlife corridors; and (5)

**DFG3**



**RESPONSE TO COMMENT LETTER FROM THE U.S. FISH AND WILDLIFE SERVICE (FEDERAL AGENCY), SIGNED BY THERESE O'ROURKE/CALIFORNIA DEPARTMENT OF FISH AND GAME, SIGNED BY DONALD CHADWICK (JOINT LETTER), DATED FEBRUARY 14, 2005**

**Response to Comment DFG1:**

Comment noted.

**Response to Comment DFG2:**

Comment noted.

**Response to Comment DFG3:**

Comment noted. The Grantville Program EIR has been prepared pursuant to Sections 15168(a)(3) and 15180 of the CEQA Guidelines. The Program EIR address the anticipated environmental impacts associated with the adoption of the proposed redevelopment plan, and continued implementation of land uses pursuant to the existing adopted community plan land uses of the project area. No specific development project is proposed, and the Program EIR analyzes the potential environmental impacts based on the development potential of land uses in the Project Area. Subsequent redevelopment activities will be assessed for compliance with CEQA, including potential biological impacts.

Mr. Reed (FWS-SDG-4185.2)

2

DFG3  
(cont'd.)

narrow endemic species. The DEIR does not provide analyses of potential biological impacts from any specific redevelopment project that may occur pursuant to the DEIR. However, the DEIR indicates that additional environmental review will be conducted where specific actions would result in impacts to sensitive habitats and/or wildlife corridors or the MHPA. We offer many of the same comments that we provided in our NOP letter to assist us in our review of subsequent environmental documentation prepared for projects proposed as part of the Grantville Redevelopment Project, assist the City in compliance with pertinent Federal and state regulations and laws, ensure consistency with the MSCP, and ensure adequate protection in perpetuity of the biological resources associated with the San Diego River.

DFG4

1. The Wildlife Agencies are concerned about direct and indirect effects on the San Diego River and the sensitive habitats and species that it supports. We are particularly concerned about biological effects from construction and operational (i.e., long-term) disturbances of sensitive habitats and disruptions of wildlife movement and behavior (e.g., breeding) by human encroachment, noise, light, glare, and hydrological changes. The DEIR states that "the San Diego River riparian habitat and adjacent Diegan coastal sage scrub are still areas of relatively high species diversity and abundance and provide a regional wildlife corridor" between Mission Trails Park and Mission Bay Park, and that "these habitats and linkages are crucial for wildlife species survival and reproduction within the Redevelopment Area and surrounding region." The DEIR also explains that the much of the riparian habitat and adjacent upland vegetation communities are within the MHPA, and that the MSCP identifies the San Diego River corridor as a habitat linkage between core resource areas. We concur with these statements and cite them to emphasize that it is essential that every effort be made to protect these biological resources from additional direct and indirect impacts.

DFG5

Regarding direct impacts on wildlife corridors, the DEIR concludes that consistency with the MSCP and the City wetland regulations would generally avoid impacts to wildlife corridors (page 4.6-26). The DEIR also states, "redevelopment actions that are consistent with the City's MSCP would provide for the long-term viability of wildlife and sensitive habitats" and concludes that implementation of the nine mitigation measures identified in the DEIR would reduce the potential impacts to less than significant. The following excerpts comprise the pertinent language related to wetland buffers in the City's Environmentally Sensitive Lands Regulations (ESL Regs) and Biology Guidelines.

- a. *The applicant shall solicit input from the Resource Agencies on impact avoidance, minimization, mitigation and buffer requirements, including the need for upland transitional habitat. The applicant shall, to the maximum extent feasible, incorporate the Resource Agencies' recommendations prior to the first public hearing [Section 143.0141(a) of the ESL regs].*
- b. *A wetland buffer shall be maintained around all wetlands as appropriate to protect the functions and values of the wetland [Section 143.0141(b) of the ESL regs; Section II, (a)(1)(b) of the Biology Guidelines].*

**RESPONSE TO COMMENT LETTER FROM THE U.S. FISH AND WILDLIFE SERVICE (FEDERAL AGENCY), SIGNED BY THERESE O'ROURKE/CALIFORNIA DEPARTMENT OF FISH AND GAME, SIGNED BY DONALD CHADWICK (JOINT LETTER), DATED FEBRUARY 14, 2005 (cont.d)**

#### **Response to Comment DFG4:**

Comment noted.

#### **Response to Comment DFG5:**

As described in the EIR, a majority of the Project Area that contains sensitive habitats, including wetlands, is located within the MSCP Multiple Habitat Planning Area. All future redevelopment activities will be required to be in compliance with the City of San Diego MSCP Subarea Plan and its implementing regulations (EIR page 4.6-29). In addition to MSCP compliance, further environmental review will be required as specific development projects are proposed. As stated by the commentor, the City's Environmentally Sensitive Lands regulations require that, "A wetland buffer shall be maintained around all wetlands as appropriate to protect the functions and values of the wetlands." Additionally, all future development will be required to comply with the MSCP adjacency guidelines. Because the river is a component of the MHPA, it is anticipated that MHPA compliance will ensure that a viable wildlife corridor and river resources are maintained.

Mr. Reed (FWS-SDG-4185.2)

3

It will be relatively easy to determine whether the redevelopment projects comply with the City's specific requirements (e.g., mitigation ratios) intended to achieve consistency with the MSCP. However, depending on the application of the preceding excerpts, consistency with such specific requirements may or may not ensure adequate protection for the San Diego River and associated sensitive habitats and species. In fact, these regulations/guidelines provide no assurance that adequate buffers will be provided.

**DFG5**  
(cont'd.)

Riparian buffers are crucial for the protection of riparian habitat in urban areas. They provide numerous functions, including providing additional foraging habitat for wildlife, and reducing edge effects<sup>1</sup> such as artificial noise and light, and invasive species encroachment. Buffers are an integral part of the complex ecosystems that provide food and habitat for the fish and wildlife in stream communities. As a component of an integrated management system, riparian buffers can also protect streams by managing natural levels of nutrients and sediment (i.e., they should not be burdened by anthropogenic pollutants which often represent levels beyond their natural assimilative capacity). Therefore, we recommend the following.

**DFG6**

- a. An adequate buffer, as measured from the outside edge of the riparian habitat, should be established to protect the wetland habitats from edge effects, which can penetrate up to 200 meters from the actual reserve boundary (CBI 2000). The Fish and Game Commission Policy on the Retention of Wetland Acreage and Habitat Values states, "Buffers should be of sufficient width and should be designed to eliminate potential disturbance of fish and wildlife resources from noise, human activity, feral animal intrusion, and any other potential sources of disturbance. The size and character of buffers shall ultimately be determined by the requirements of the affected species most sensitive to such disturbances." Specific recommendations for the width of riparian buffers in published journals range from 10 to 240 meters, or approximately 33 to 787 feet, and the U.S. Army Corps of Engineers suggests that narrow strips of 100 feet may be adequate to provide many of the functions cited above (USACE 1991).

**DFG7**

- b. In addition to the width of the biological buffer, the following measures should be taken to ensure that the buffer provides the protection for which it is intended. Subsequent

<sup>1</sup> Edge effects are defined as undesirable anthropogenic disturbances beyond urban boundaries into potential reserve habitat (Kelly and Rotenberry 1993). Edge effects, such as disturbance by humans and non-native predators (pets), exotic ants, trampling, noise, and lighting, and decreases in avian productivity (Andren and Angelstam 1988), are all documented effects that have negative impacts on sensitive biological resources in southern California. Surrounding natural habitat could be permanently destroyed by human or domestic animal encroachment, trampling, bushwhacking, and frequent fires; therefore, development and open space configurations should minimize adverse edge effects (Soule 1981).

**DFG6**

Regarding artificial night lighting, illumination of riparian corridors by night lighting has the potential to adversely affect birds. Physiological, developmental, and behavioral effects of light intensity, wavelength, and photoperiod on bird species are well-documented. In the wild, urban lighting is associated with early daily initiation of avian song activity (Bergen and Abs 1997). Avian species are known to place their nests significantly farther from motorway lights than from unlighted controls (de Molenaar et al. 2000). Placement of nests away from lighted areas implies that part of the home range is rendered less suitable for nesting by artificial light. If potential nest sites are limited within the bird's home range, reduction in available sites associated with artificial night lighting may cause the bird to use a suboptimal nest site, that is more vulnerable to predation, cowbird parasitism, or extremes of weather.

**RESPONSE TO COMMENT LETTER FROM THE U.S. FISH AND WILDLIFE SERVICE (FEDERAL AGENCY), SIGNED BY THERESE O'ROURKE/CALIFORNIA DEPARTMENT OF FISH AND GAME, SIGNED BY DONALD CHADWICK (JOINT LETTER), DATED FEBRUARY 14, 2005 (cont.d)**

**Response to Comment DFG6:**

The comment is acknowledged. The Agency concurs that the size and character of buffers shall ultimately be determined by the requirements of the affected species most sensitive to such disturbances and that specific recommendations for the width of the riparian buffers range between 33 and 787 feet. Because no specific developments are proposed, there is no specific buffer width identified in the EIR. It is acknowledged that subsequent environmental review will be required for specific projects, and that the appropriate buffer width and configuration would be determined based on the potential impact and potentially-impacted species.

**Response to Comment DFG7:**

Comment noted. EIR Mitigation Measure BR 2 has been modified to incorporate the language recommended by the commentor so as to ensure that proposed buffers provide the protection as intended. Mitigation Measure BR 2 has been modified as follows:

- BR2** Further environmental review shall be conducted in accordance with appropriate CEQA documentation requirements where specific actions would result in impacts to sensitive habitats and/or wildlife corridor/MHPA preserve areas. These reviews shall be conducted at the earliest possible period of tiered project review to ensure the most flexibility in planning and project design, and resolve conflicts with significant biological resources.

- i. Trails should be kept out of the biological buffer except in areas of lower biological sensitivity. Trails within the buffer should be limited to trails that provide access to biological and /or cultural interpretive areas along the River, and aligned roughly perpendicular to the length of the buffer (i.e., spur trails). These interpretive areas and spur trails should be carefully chosen and should not be placed in biologically sensitive areas or areas with strong potential for effective habitat restoration and enhancement of species diversity.
- ii. As required by the MSCP Subarea Plan, native vegetation should be restored as a condition of future development proposals along the Urban Habitat Areas of the San Diego River corridor.



Mr. Reed (FWS SDG-4185.2)

4

environmental documentation should provide adequate information (e.g., restoration plan) for public review about how each of these measures will be implemented.

- i. Trails should be kept out of the biological buffer except in areas of lower biological sensitivity. Trails within the buffer should be limited to trails that provide access to biological and/or cultural interpretive areas along the River, and aligned roughly perpendicular to the length of the buffer (i.e., spur trails). These interpretive areas and spur trails should be carefully chosen and should not be placed in biologically sensitive areas or areas with strong potential for effective habitat restoration and enhancement of species diversity.
- ii. As required by the MSCP Subarea Plan, native vegetation should be restored as a condition of future development proposals along the Urban Habitat Areas of the San Diego River corridor.
- iii. Permanent fencing and signage should be installed at the outside edge of the buffer areas. The limits of spur trails within the buffer should be effectively demarcated and/or fenced to avoid human encroachment into the adjacent habitat. The fencing should be designed to prevent encroachment by humans and domestic animals into the buffer areas and riparian corridor<sup>2</sup>. The signage should inform people that sensitive habitat (and, if appropriate, mitigation land) lie beyond the fencing and that entering the area is illegal.
- iv. All post-construction structural best management practices (BMPs) such as grass swales, filter strips, and energy dissipators, should be outside of the riparian buffer and the riparian corridor (i.e., they should be within the development footprint). All filtration and attenuation of surface flows provided by the proposed BMPs should occur prior to the discharge of the flows into the buffer areas.
- v. Brush management zones should be outside the riparian buffer. The City's proposed brush management regulations state "no brush management is required in areas containing wetland vegetation."<sup>3</sup>
- vi. No additional lighting should be added within the vicinity of both upland and wetland sensitive habitats, and where possible, existing lighting within such areas should be removed.

2 The following web sites provide some information on fencing that exclude cats or that may exclude cats more effectively than simple chain link fencing; the Wildlife Agencies do not endorse the products/ideas on any of these web sites, but we suggest that they be considered to meet the project-related fencing needs: <http://www.purfectfence.com/>; <http://www.xcluser.co.nz/xkiwi.htm> (this website is for a manufacturer in New Zealand... we do not know whether they have distributors in California); <http://www.catfencein.com/>; <http://www.catfence.com/contact.htm>; <http://www.corporatevideo.com/kilpa/index.htm>; <http://www.omegafence.com/>; <http://www.coyotaroller.com/> (this website is for a product that is put on top of a chain link fence).

3 The Wildlife Agencies recommended in a joint comment letter (July 9, 2004) on the draft EIR for the proposed brush management revisions, that this requirement apply to both Zones 1 and 2, not only to Zone 2 as proposed.

**RESPONSE TO COMMENT LETTER FROM THE U.S. FISH AND WILDLIFE SERVICE (FEDERAL AGENCY), SIGNED BY THERESE O'ROURKE/CALIFORNIA DEPARTMENT OF FISH AND GAME, SIGNED BY DONALD CHADWICK (JOINT LETTER), DATED FEBRUARY 14, 2005 (cont.d)**

**Response to Comment DFG7 (cont.d):**

- iii. Permanent fencing and signage should be installed at the outside edge of the buffer areas. The limits of spur trails within the buffer should be effectively demarcated and/or fenced to avoid human encroachment into the adjacent habitat. The fencing should be designed to prevent encroachment by humans and domestic animals into the buffer areas and riparian corridor. The signage should inform people that sensitive habitat (and, if appropriate, mitigation land) lie beyond the fencing and that entering the area is illegal.
- iv. All post-construction structural best management practices (BMPs) such as grass swales, filter strips, and energy dissipators, should be outside of the riparian buffer and the riparian corridor (i.e., they should be within the development footprint). All filtration and attenuation of surface flows provided by the proposed BMPs should occur prior to the discharge of the flows into the buffer areas.
- v. Brush management zones should be outside the riparian buffer. The City's proposed brush management regulations state "no brush management is required in areas containing wetland vegetation."
- vi. No additional lighting should be added within the vicinity of both upland and wetland sensitive habitats, and where possible, existing lighting within such areas should be removed.
- vii. As to noise, methods should be employed to attenuate project-related construction and operational noise levels in excess of ambient levels at the edge of sensitive habitats to avoid or minimize further degradation by noise of conditions for wildlife, particularly, avian species. Where possible, existing sources of noise audible within the buffer should be removed.
- viii. All areas within biological buffers should be added to the MHPA, if not already within it, and should be accordingly managed in perpetuity to maintain the biological functions and values the buffers are intended to protect.

**DFG7**  
(cont'd.)

**RESPONSE TO COMMENT LETTER FROM THE U.S. FISH AND WILDLIFE SERVICE (FEDERAL AGENCY), SIGNED BY THERESE O'ROURKE/CALIFORNIA DEPARTMENT OF FISH AND GAME, SIGNED BY DONALD CHADWICK (JOINT LETTER), DATED FEBRUARY 14, 2005 (cont.d)**

**Response to Comment DFG7 (cont.d):**

The Agency also agrees that the proposed project presents an opportunity to improve the protection of the San Diego River, which is, basis in part, as to the inclusion of these open space areas of the river as part of the redevelopment project area. The redevelopment plan recognizes the San Diego River as a significant resource, and includes the following goals related to the river:

- Address urban runoff and industrial pollution issues to minimize negative impacts on sensitive environmental resources and to optimize the environmental assets of the Project Area such as the San Diego River and Mission Trails Regional Park (Goal #11)
- Support habitat conservation and restoration along the San Diego River in coordination with developed plans for the area and in concert with other related municipal and private entity activities (Goal #13)

Mr. Reed (FWS-SDG-1185.2)

5

- vii. As to noise, methods should be employed to attenuate project-related construction and operational noise levels in excess of ambient levels at the edge of sensitive habitats to avoid or minimize further degradation by noise of conditions for wildlife, particularly, avian species. Where possible, existing sources of noise audible within the buffer should be removed.
- viii. All areas within biological buffers should be added to the MHPA, if not already within it, and should be accordingly managed in perpetuity to maintain the biological functions and values the buffers are intended to protect.

DFG7  
(cont'd.)

We recognize that there is extant development that will remain and present constraints in some areas in providing uniformly adequate buffers for the riparian corridor. Nevertheless, we believe that the redevelopment project provides ample opportunity to improve the protection of the San Diego River and the biological resources it supports. We hope that, for all redevelopment projects adjacent or proximate to the San Diego River, the City (i.e., applicant) will solicit input from the Wildlife Agencies regarding the appropriate buffer width and requirements early in the design phase for each project, and will incorporate our recommendations into the project design so that the draft CEQA documents reflect the adequate buffers and measures to protect them in perpetuity.

- 2. Though the DEIR identifies some potential edge effects (i.e., indirect impacts, page 4.2-28), subsequent environmental documentation should provide a thorough discussion of potential project-related edge effects and specific measures that would be implemented to avoid or minimize the effects. Although one of the principles of the City's Draft River Park Master Plan is to reorient development toward the San Diego River, we are concerned that situating development in such a manner will result in otherwise avoidable indirect impacts to the San Diego River and the associated biological resources and adjacent uplands. If this principle is pursued for the redevelopment projects subject to this DEIR, the subsequent environmental documentation should thoroughly describe how the projects are designed to avoid or minimize edge effects.
- 3. Citing the draft San Diego River Master Plan as the source of information, the DEIR describes six areas as potential sites for mitigation for project-related impacts (pages 4.6-30 through 4.6-32). We support restoration of all these areas and more, provided that: a) they are adjacent to areas of sensitive habitat that is intended to be preserved in perpetuity; b) adequate buffers are established; c) the mitigation areas and adjacent habitat are within the MHPA already or will be added to the MHPA; and, d) the mitigation areas and adjacent habitat will be adequately managed in perpetuity.
- 4. The DEIR includes statements about the MSCP which warrant elaboration. We discuss these below and request that the final EIR reflect the following comments.

DFG8

DFG9

DFG10

- a. Page 4.6-19 of the DEIR states, the City "has take authority over many of the areas' State-listed species through the MSCP." While this is true, it should be clarified that the authority for take is contingent on the City's implementation of the MSCP, and in this

## RESPONSE TO COMMENT LETTER FROM THE U.S. FISH AND WILDLIFE SERVICE (FEDERAL AGENCY), SIGNED BY THERESE O'ROURKE/CALIFORNIA DEPARTMENT OF FISH AND GAME, SIGNED BY DONALD CHADWICK (JOINT LETTER), DATED FEBRUARY 14, 2005 (cont.d)

### Response to Comment DFG8:

It is anticipated that future redevelopment activities would need to be consistent with the City's River Park Master Plan, when adopted. The River Park Master Plan is currently a draft document, and adoption by the City will require environmental documentation pursuant to CEQA. It is anticipated that the concerns of the commentor regarding potential indirect effects associated with implementation of the River Park Master Plan would be evaluated by the City as part of the future adoption of the Master Plan. It is acknowledged that subsequent redevelopment activities will be required to be evaluated pursuant to CEQA, potential biological impacts, and consistency with other adopted plans and regulations.

### Response to Comment DFG9:

The EIR analysis identifies potential biological mitigation opportunities, and demonstrates that there are feasible mitigation opportunities in the Project Area. The comment is acknowledged that potential mitigation sites, as identified in the EIR and the Draft River Park Master Plan, will be required to meet the criteria identified by the commentor.

### Response to Comment DFG10:

EIR page 4.6-19 has been modified as follows:

The Federal government also regulates impacts on rare plant and animal species through the Endangered Species Act. Federally listed species with potential to occur in the Project Area are listed in Tables 4.6-2 through 4.6-4. Note; however, that the City of San Diego has take authority over many of the areas' federally-listed species through the MSCP, contingent on the City's implementation of the MSCP, including the species-specific measures identified in Appendix A (i.e., Table 3-5) of the City's MSCP Subarea Plan. Impacts to MSCP-covered listed species outside the MHPA may also be allowed through permits issued by the City of San Diego; however, in certain cases take may not be authorized, or conditions for coverage may require that impacts be avoided, even outside of the MHPA. Species-specific conditions required for coverage are included in Table 3-5 of the MSCP Plan, Appendix A of the City's Subarea Plan, and the Federal Fish and Wildlife Permit for Endangered/Threatened Species PRT-830421. Take of MSCP covered species within the MHPA is not allowed. Any impacts to non-covered listed species would require a Section 7 or 10 consultation before a permit may be issued by the U.S. Fish and Wildlife Service (USFWS).

Mr. Reed (FWS-SDG--4185.2)

6

DFG10  
(cont'd.)

case, particularly the species-specific measures identified in Appendix A (commonly known as Table 3-5) of the City's MSCP Subarea Plan.

DFG11

- b. Page 4.6-19 of the DEIR states, "impacts to MSCP-covered species outside the MHPA are allowed through permits issued by the City." This statement is not entirely correct. Although a species may be covered under the City's Subarea Plan, take authorization may not be authorized, or conditions for coverage may require that impacts be avoided, even outside of the MHPA. Species-specific conditions required for coverage are included in Table 3-5 of the MSCP Plan, Appendix A of the City's Subarea Plan, and the Federal Fish and Wildlife Permit for Endangered/Threatened Species PRT-830421. For example, incidental take of covered species due to mortality or habitat loss within U.S. Army Corps of Engineers (Corps) jurisdictional wetlands and/or vernal pools is not authorized by the MSCP. Incidental take authorization for projects that affect federally listed species (1) that occur in Corps jurisdictional wetlands, (2) that are not covered under the MSCP (e.g., Quino checkerspot butterfly (*Euphydryas editha quino*, Quino), and/or (3) for which the City does not have take authorization (e.g., species that occur in vernal pools) will have to be obtained through consultation with the Service through section 7, provided there is a federal nexus, or section 10 of the federal Endangered Species Act (ESA). If, under any of these circumstances, the affected species is/are also a state-listed species, the City may (depending on whether the effects constitute take under the California ESA [CESA]) also need take authorization under either section 2081 or 2080.1 of CESA. It should be noted that because Subarea 2 of the project footprint is partially within the Service's Year 2002 Recommended Quino Survey Area, a qualified biologist should conduct a habitat assessment for Quino and, if appropriate, surveys for Quino, when a specific project is proposed for that area. Regarding the federally and state listed least Bell's vireo (*Vireo bellii pusillus*), a wetland dependent species likely to occur within the project's area of potential effect, it should be noted that the MSCP requires that loss of occupied habitat be avoided both inside and outside the MHPA during the breeding season.

DFG12

5. Page 4.6-20 of the DEIR states, "for projects that would not impact any of the City of San Diego Tier I-III habitats or wetlands (including wetland buffers), no biological resource impacts would be anticipated." Disturbed and agricultural areas (i.e., Tier IV areas) can support habitat for some listed and otherwise sensitive species. For example, the arroyo southwestern toad (*Bufo microscaphus californicus*) can use agricultural lands adjacent or proximate to occupied streams. In addition, trees within Tier IV areas can provide avian nesting habitat, particularly if the trees are near habitats that provide foraging opportunities for birds. Furthermore, disturbed and agricultural areas can serve to buffer sensitive habitats from edge effects and human and pet encroachment associated with development. While arroyo toads do not occupy the reach of the San Diego River within the proposed redevelopment area, the statement in the DEIR should be modified to reflect the potential for some biological resources to occur in Tier IV areas. While the redevelopment projects that occur in Tier IV areas would not be required to mitigate for loss of habitat, site-specific assessment should occur to determine whether there is potential for active avian nests on site. If there is potential, measures to avoid impacts on the nests should be implemented.

**RESPONSE TO COMMENT LETTER FROM THE U.S. FISH AND WILDLIFE SERVICE (FEDERAL AGENCY), SIGNED BY THERESE O'ROURKE/CALIFORNIA DEPARTMENT OF FISH AND GAME, SIGNED BY DONALD CHADWICK (JOINT LETTER), DATED FEBRUARY 14, 2005 (cont.d)**

**Response to Comment DFG11:**

Please refer to response to comment DFG10. It is acknowledged that a portion of the Project Area is partially located within the Service's Year 2002 Recommended Quino Survey Area. A habitat assessment, and possibly surveys would be required as part of the subsequent evaluation of a specific redevelopment activity.

It is also acknowledged that any future potential loss of least Bell's vireo occupied habitat be avoided both inside and outside of the MHPA during the breeding season.

**Response to Comment DFG12:**

EIR page 4.6-20 has been modified as follows:

For projects that would not impact any City of San Diego Tier I-III habitats or wetlands (including wetland buffers), no biological resource impacts would be anticipated. For areas that ~~do have contain~~ Tier I, Tier II, Tier III and Tier IV habitats that would be impacted and Tier II habitats, a site-specific analysis of biological resources should be conducted using the data included herein as a basis. Although Tier IV habitats are not considered sensitive, disturbed and agricultural areas could support sensitive species.

Mr. Reed (FWS-SDG--1185.2)

7

DFG13

6. The DEIR discusses, and depicts on figures the locations of, areas that support sensitive habitats (pages 4.6-22 through 4.6-28, figures 4.6-1 through 4.6-4). The final EIR should clarify whether this is an exhaustive list of the sensitive habitats within the redevelopment area or whether more may be revealed during project-specific analyses.

DFG14

7. Page 4.6-23 of the DEIR discusses the redevelopment area near Alvarado Canyon and Adobe Falls Road. The final EIR should clarify whether this area encompasses any locations where Supplemental Environmental Projects approved by the San Diego Regional Water Quality Control Board (e.g., Adobe Falls, San Diego River Invasive Exotic Weed Eradication Program) have occurred or are expected to occur.

DFG15

8. The DEIR states, "the redevelopment of the currently disturbed mining areas would not result in significant impact on biological resources" (page 4.6-25), and "the river corridor through the mine site is infested with exotic plant species" (page 4.11-8). Any subsequent environmental analyses conducted for redevelopment in this area should examine the impacts of the redevelopment on species diversity and abundance, and wildlife movement through the area. It may be that redevelopment of the mining areas would have significant impacts on biological resources, as birds can occupy areas infested by weeds, and some wildlife species may use the area as a movement corridor. While the mining operations cause significant indirect impacts that diminish the biological potential of the adjacent and proximate reaches of the San Diego River and associated habitats, future land uses could result in a continuation of significant negative biological impacts.

DFG16

9. The City's CEQA significance determination guidelines establish the following significance thresholds below which mitigation would not be required: a) loss of less than 0.10 acre of Tier I through Tier III; b) loss of less than 1.0 acre non-native grassland completely surrounded by existing urban development, and not associated with or mapped in close proximity to other habitats; and c) loss of less than 0.01 acre of wetlands, except vernal pools. One of the DEIR's proposed mitigation measures is the mitigation of the loss of Tier I-III habitats per the MSCP requirements. Program EIRs provide an occasion for a more exhaustive consideration of effects and alternatives than would be practical in an EIR on an individual action, and ensure consideration of cumulative impacts, that might be slighted in a case-by-case analysis (Section 15168[b][1&2] of the CEQA Guidelines). Accordingly, the City should use the estimated cumulative losses that will result from all the projects conducted under the final EIR in determining whether project-related habitat losses exceed the City's CEQA significance determination thresholds and require mitigation. If, as the projects are implemented, the estimated acreages change, the mitigation requirements would change accordingly.

DFG17

10. The NOP for the project indicated that the project area encompasses 831 acres. Table 4.6-1 indicates that the project area encompasses 970 acres, and the biological resources report (Rocks Biological Consulting, October 2004) indicates that the project area encompasses 1,400 acres (page 1), though the acreages identified for the habitat types add up to approximately 977 acres. Please reconcile these apparent discrepancies.

**RESPONSE TO COMMENT LETTER FROM THE U.S. FISH AND WILDLIFE SERVICE (FEDERAL AGENCY), SIGNED BY THERESE O'ROURKE/CALIFORNIA DEPARTMENT OF FISH AND GAME, SIGNED BY DONALD CHADWICK (JOINT LETTER), DATED FEBRUARY 14, 2005 (cont.d)**

**Response to Comment DFG13:**

A detailed biological survey of the Project Area was conducted in summer 2004 and the habitats and resources observed are depicted in the EIR and biology technical report figures. However, no focused surveys were conducted, as focused surveys are appropriately conducted at the time specific developments are proposed. It is not anticipated that more habitat communities would be revealed based on subsequent biology surveys; however it should be noted that the EIR evaluates potential impacts associated with continued implementation of the adopted community plan over a 30-year period. It is recognized that biological conditions are likely to change over the course of this period.

**Response to Comment DFG14:**

Arrondo was observed throughout the Alvarado Canyon area. It is not known what phase or stages any programs are in; however, future redevelopment projects would need to take into consideration these restoration activities.

**Response to Comment DFG15:**

Comment noted.

**Response to Comment DFG16:**

The comment is noted. Because no specific projects are proposed, it is not possible to provide a quantification of the potential cumulative loss of habitat within the Project Area at the Program EIR level of analysis. Pursuant to CEQA, any future redevelopment activities would be required to consider the potential cumulative effects and mandatory findings of significance.

**Response to Comment DFG17:**

The Project Area comprises approximately 970 acres. The biology report has been modified to reconcile the acreage discrepancies.

Mr. Reed (FWS-SDG-4185.1)

8

11. In addition to the items already discussed in this letter, subsequent environmental documentation, as needed for each redevelopment project, should provide the following information.

- a. A complete description of the proposed project.
- b. A range of practicable alternatives that have been considered to reduce project impacts to biological resources, including the MHPA.
- c. A thorough justification for any proposed River crossings. Proposed River crossings, if any, should be proposed for areas of lesser biological value, avoid direct impacts to the San Diego River and riparian habitats, retain the viability of the riparian habitat and adjacent uplands as a wildlife movement corridor, and preclude the need for ongoing maintenance (i.e., disturbance of the native habitat).
- d. Verification that all requirements and conditions of the MSCP Subarea Plan and Implementing Agreement are met.
- e. A discussion of the biological issues that are not addressed in, or covered by, the Subarea Plan and Implementing Agreement, such as specific impacts to and mitigation requirements for wetlands or sensitive species that occur therein.
- f. If the project is in the 100-year floodplain of the San Diego River, a discussion of how the project will comply with the ESL regulations for development within the floodplain.<sup>4</sup>
- g. For the purpose of determining consistency among efforts to protect, restore, and/or enhance biological resources supported by the San Diego River within the redevelopment project area, a discussion of the organizations, agencies, jurisdictions, and other entities which are conducting such efforts. This discussion should include the following information.

DFG18

<sup>4</sup> In particular, section 143.0145(e)(6) states, "Development shall not significantly adversely affect existing sensitive biological resources on-site or off-site," and section 143.0145(f) includes several provisions intended to protect biological resources, such as: (1) Within the flood fringe of a Special Flood Hazard Area, permanent structures and fill for permanent structures, roads, and other development are allowed only if the following conditions are met: (A) The development or fill will not significantly adversely affect existing sensitive biological resources on-site or off-site; (B) The development is capable of withstanding flooding and does not require or cause the construction of off-site flood protective works including artificial flood channels, revetments, and levees nor will it cause adverse impacts related to flooding of properties located upstream or downstream, nor will it increase or expand a (FIRM) Zone A; (C) Grading and filling are limited to the minimum amount necessary to accommodate the proposed development, harm to the environmental values of the floodplain is minimized including peak flow storage capacity, and wetlands hydrology is maintained; (D) The development neither significantly increases nor contributes to downstream bank erosion and sedimentation nor causes an increase in flood flow velocities or volume; and (E) There will be no significant adverse water quality impacts to downstream wetlands, lagoons or other sensitive biological resources, and the development is in compliance with the requirements and regulations of the National Pollution Discharge Elimination System, as implemented by the City of San Diego. (F) The design of the development incorporates the findings and recommendations of both a site specific and coastal watershed hydrologic study.

**RESPONSE TO COMMENT LETTER FROM THE U.S. FISH AND WILDLIFE SERVICE (FEDERAL AGENCY), SIGNED BY THERESE O'ROURKE/CALIFORNIA DEPARTMENT OF FISH AND GAME, SIGNED BY DONALD CHADWICK (JOINT LETTER), DATED FEBRUARY 14, 2005 (cont.d)**

#### **Response to Comment DFG18:**

Comment noted.

Mr. Reed (FWS-SDG--H85.1)

9

- i. A list of the organizations (e.g., San Diego River Park Foundation, San Diego River Coalition, Lakeside Conservancy), agencies (e.g., San Diego River Conservancy), and jurisdictions (e.g., the City). The City should circulate the DEIR to all the entities identified.
  - ii. A description of each of the entity's goal, objectives, and efforts to date and proposed efforts, focusing on the reach of the river that is within the proposed redevelopment zone.
  - iii. A discussion about how the proposed project conforms with the goals and objectives of the identified entities, and avoids impacts to the already preserved habitats. For example, discuss how the proposed project conforms with the City's San Diego River Natural Resources Management Plan (NRMP)<sup>5</sup> (City and Merkel & Associates 2003) and the San Diego River Master Plan.
- h. A biological technical report that includes survey methods (including survey personnel, dates, times, and climate conditions), survey results, impact analysis, and proposed mitigation. The report should describe the biological resources associated with each habitat type. These descriptions should include both qualitative and quantitative assessments of the resources present on the proposed subject property and alternative sites, and include complete species lists for all biological resources on site. At a minimum, the following should be included.
- i. A list of federally proposed listed or candidate species, state listed and candidate species, and locally sensitive species that occur on, or in habitat contiguous with, the subject property including, but not limited to, narrow endemic species that are on or near the subject property. A detailed discussion of these species, including information pertaining to their local status and distribution, should also be included.
  - ii. A comprehensive discussion about the existing biological resources within and adjacent to areas potentially affected by the redevelopment project. Include specific acreage and description of the types of riparian, wetland, non-wetland waters of the U.S., coastal sage scrub, and other sensitive habitats that may be affected by the proposed project or project alternatives, results of early and late spring plant surveys for sensitive spring blooming annuals (including a section which discusses the rationale for why species with a high potential for occurrence may not have been detected). Maps and tables should be included to summarize such information.
  - iii. A map showing potential wildlife corridors through and/or adjacent to the subject property.

DFG18  
(cont'd.)

---

<sup>5</sup> This discussion should take into account the comments the City received on the draft NRMP (e.g., comments from the Department via e-mail, and a letter from the U.S. Fish and Wildlife Service dated May 17, 2004), and the City's responses to those comments.

Mr. Reed (FWS-SDG-4185.1)

10

- iv. Figures that depict both the development footprint, updated biological data, and the relationship of the subject property to the MHPA both on and off site.
- v. A comprehensive discussion about the positive and negative biological impacts that might result from future redevelopment in the vicinity of, or adjacent to, the San Diego River.
- vi. An assessment of direct, indirect, and cumulative project impacts to fish and wildlife species and associated habitats. All facets of the project (e.g., construction, implementation, operation) should be included in this assessment. We are particularly interested in any potential impacts to the MHPA, the San Diego River, wildlife corridors, and narrow endemic species. This assessment should also include the following.
  - a. A complete hydrological analysis for this project to evaluate potential changes to hydrology, and how those changes may affect the San Diego River, wetlands, riparian areas, and the MHPA.
  - b. Methods (e.g., BMPs) that will be employed to prevent soil erosion and siltation of habitats on and off site.
  - c. Methods (e.g., BMPs) that will be employed to prevent discharge and disposal of toxic and/or caustic substances, including oil and gasoline, from the proposed development.
  - d. A thorough analysis of noise and light impacts on wildlife, including avian species, and measures to be taken to mitigate any adverse impacts resulting from increased noise and light levels.
  - e. An analysis of how project-induced impacts may induce fragmentation of open space, isolate wildlife and native vegetation communities, and affect wildlife movement at a local and regional scale.
- vii. Specific mitigation and restoration plans to fully offset project related impacts, including proposals for mitigating the cumulative impacts of direct and indirect habitat loss, degradation, or modification.
  - a. Project impacts should be mitigated through the preservation, creation, restoration, and/or enhancement of affected habitat types consistent with MSCP guidelines.
  - b. Mitigation and restoration plans, if proposed, should be prepared by persons with specific expertise on southern California ecosystems and native plant revegetation techniques. Each plan should include, at a minimum: (a) the location of the mitigation site; (b) the plant species to be used; (c) a schematic layout depicting the mitigation area; (d) time of year that planting will occur; (e)

DFG18  
(cont'd.)



Mr. Reed (FWS-SDG-4185.1)

11

a description of the irrigation methodology to be employed; (f) measures to control exotic vegetation on site; (g) a detailed monitoring program which includes provisions for replanting areas where planted materials have not survived; and (h) success criteria and identification of the agency that will guarantee successful creation of the mitigation habitat and provide for the conservation of the restoration site in perpetuity.

- c. Measures to be taken to perpetually protect habitat values of preserved and/or mitigation areas. Issues that should be addressed include: restrictions on vehicle and equestrian access; proposed land dedications; monitoring and management programs; control of illegal dumping; restrictions on lighting near mitigation areas; and consistency with the MHPA land use adjacency guidelines, etc.
- d. Mitigation for impacts on wildlife movement should include consideration of the installation of bridges of adequate span to allow for wildlife movement beneath them, directional fencing long enough to prevent end runs, construction of adequately sized new culverts where need is indicated for wildlife movement and bridges are infeasible, installation of structures (e.g., berms, sound walls) to attenuate noise and light (e.g., car and street lights).
- e. Measures to be taken to avoid or minimize biological impacts from brush management that might be associated with redevelopment. These measures should include alternatives to brush management within sensitive habitat inside and outside the MHPA. Such alternatives include strategic placement of buildings, and the use of fire walls and building designs that preclude or reduce the need for fuel management Zone 2. The discussion should also identify the benefits of accomplishing fire protection by one-time building design and placement rather than on-going brush management in often inadequately maintained brush management areas.
- f. A description of how the proposed project will reduce existing negative biological impacts and avoid introducing new negative impacts to the San Diego River corridor. The NRMP encompasses most of the reach of the River within the proposed redevelopment area (Figure 2 in the NRMP). As the NRMP states, and as identified in the City's MSCP Subarea Plan, "major issues facing urban habitat areas, such as the NRMP area, include intense land uses adjacent to sensitive habitat, litter and vandalism, itinerant living quarters, infrastructure maintenance activities, invasive plants and animals, and degraded water quality resulting from urban runoff." All redevelopment activities within the area of potential effect<sup>6</sup> on sensitive biological resources associated with the San Diego River and adjacent upland habitats should be designed and conducted to avoid additional negative impacts on the resources. Furthermore, the existing negative impacts should be reduced by enhancing and/or restoring sensitive biological resources.

DFG18  
(cont'd.)

---

6 The area of potential effect includes tributaries to the San Diego River (e.g., Alvarado Canyon).


Mr. Reed (FWS-SDG-4135.1)

12

DFG19

The Wildlife Agencies appreciate the opportunity to comment on this DEIR. Please contact Carolyn Lieberman of the Service at (760) 431-9440, or Libby Lucas of the Department at (858) 467-4230 if you have any questions or comments concerning this letter.

Sincerely,



Therese O'Rourke  
Assistant Field Supervisor  
U.S. Fish and Wildlife Service



Donald Chadwick  
Habitat Conservation Planning Supervisor  
California Department of Fish and Game

cc: California Regional Water Quality Control Board, San Diego Region (Stacey Baczowski)  
San Diego River Conservancy (Deborah Jayne)  
United States Army Corps of Engineers (Terry Dean)  
State Clearinghouse

## References Cited:

City of San Diego and Merkel & Associates. 2003. Draft San Diego River Natural Resources Management Plan.

Andren, H. and P. Angelstam. 1988. Elevated predation rates as an edge effect in habitat islands: experimental evidence. *Ecology* 64: 1057-1068.

Bergen, F. and M. Abs. 1997. Etho-ecological study of the singing activity of the blue tit (*Parus caeruleus*), great tit (*Parus major*) and chaffinch (*Fringilla coelebs*). *Journal fur Ornithologie* 138(4):451-467

Conservation Biology Institute. 2000. Public Review Draft MHCP Plan Volume 1.

Kelly, P. A. and J. T. Rotenberry. 1993. Buffer zones for ecological reserves in California. In J. E. Keeley, ed. *Interface Between Ecology and Land Development in California*. Southern California Academy of Sciences, Los Angeles.

de Molenar, J. G., D. A. Jonkers, and M. E. Sanders. 2000. Road illumination and nature. III. Local influence of road lights on a black-tailed godwit (*Limosa l. limosa*) population. Report prepared for Directorate-General of Public Works and Water Management, by Alterra, Green World Research. Wageningen, Netherlands

Soulé, Michael E. 1991. Land use planning and wildlife maintenance. *Journal of the American Planning Association*, Vol. 57, No. 3, Summer 1991. American Planning Association, Chicago, Illinois.

**RESPONSE TO COMMENT LETTER FROM THE U.S. FISH AND WILDLIFE SERVICE (FEDERAL AGENCY), SIGNED BY THERESE O'ROURKE/CALIFORNIA DEPARTMENT OF FISH AND GAME, SIGNED BY DONALD CHADWICK (JOINT LETTER), DATED FEBRUARY 14, 2005 (cont.d)**

**Response to Comment DFG19:**

Comment noted.

Mr. Reed (FWS-SDG-4185.1)

13

United States Army Corps of Engineers (USACE). 1991. Hydraulic design of flood control channels. USACE Headquarters, EM11102-0-1601, Washington D.C.



# SAN DIEGO COUNTY OFFICE OF EDUCATION

6401 LINDA VISTA ROAD, SAN DIEGO, CALIFORNIA 92111-7399 (858) 292-3500

Superintendent of Schools  
Rudy M. Castruita, Ed D.

February 2, 2005

Mr. Tracy Reed  
Project Manager  
City of San Diego Redevelopment Agency  
600 B Street, Suite 400  
San Diego, CA 92101-4506

## RE: Response to Notice of Preparation of a Draft Environmental Impact Report (EIR)

Dear Mr. Reed:

The San Diego County Office of Education (COE) is in receipt of the Notice of Preparation for a Draft Environmental Impact Report (EIR) for the Grantville Redevelopment Plan. This letter constitutes our response to the notice.

The COE provides a variety of school and educational services to County residents. Unlike local school districts, the COE provides its services throughout the County, making it the equivalent of a countywide school district. As a result, the COE is affected by new development wherever it occurs in the County.

## COE1

Some COE programs provide direct services to students, including children (infants, pre-school, and students in grades K-12) as well as adults. Other COE services are provided through public schools, including all forty-three school districts and all five community college districts in the County. These services include staff development for teachers and current and prospective administrators as well as numerous management support services. The following COE programs may be affected by the Grantville Redevelopment Plan:

- Regional Occupation Program
- Hope Infant Handicapped Program
- Migrant Education Program
- Outdoor Education Program
- Teacher Training and Development
- Administration Training and Development
- COE Administration

## Board of Education

Nick Aguilar Ernest J. Dronenburg, Jr. Susan Hartley Robert J. Watkins John Witt

## SERVICE AND LEADERSHIP

## RESPONSE TO COMMENT LETTER FROM SAN DIEGO COUNTY OFFICE OF EDUCATION, SIGNED BY BOB NICHOLSON, DATED FEBRUARY 2, 2005

### Response to Comment COE1:

The EIR provides a quantification of potential buildout of the Project Area according to adopted Community Plan land use designations (EIR, Table 3-2, page 3-9). The Project Area does not contain existing residential uses, although two portions of the Project Area are designated in the Navajo Community for residential uses. The subject areas currently contain non-residential uses including parkland, hotel, school, and commercial uses. Because of their existing uses, they are not likely to redevelop to a residential use. However, assuming these parcels are redeveloped according to the adopted community plan land use, a total of 48 single-family dwelling units, and 86 multi-family residential dwelling units could be constructed.

According to City of San Diego School Generation Factors, a total of 65 students would be generated by the redevelopment of these parcels according to the adopted residential land use designations. This increase would not represent a significant impact to school facilities.

Additionally, Health and Safety Code Section 33607.5 presents the legally mandated formula for paying a portion of the tax increment to all of the affected taxing entities (which includes the San Diego County Office of Education). These new funds are available to be used for education facilities that benefit the Project Area.

**RESPONSE TO COMMENT LETTER FROM SAN DIEGO COUNTY OFFICE OF  
EDUCATION, SIGNED BY BOB NICHOLSON, DATED FEBRUARY 2, 2005 (cont.d)**

**Response to Comment COE2:**

Comment noted.

In order to provide an accurate analysis of potential impacts resulting from this project to the COE the DRAFT EIR should:

**COE1**  
(cont'd.)

- Quantify the scope and build out of anticipated commercial and residential development (at all densities).
- Quantify the projects direct and indirect effects on population, on student generation and on the costs of facilities to accommodate these new students.
- Include a discussion of the possibility for the use of joint use facilities by schools and public and private agencies, e.g. different city departments such as recreation or public works

We encourage and support cities and counties in the use of the redevelopment process and tax increment revenues for the elimination of blight and to improve the economic viability of areas. However, school districts and the COE will be impacted due to increases in population bringing new students.

**COE2**

We look forward to working with the Agency to reduce or fully mitigate these impacts in creative and mutually beneficial ways when possible. If you have any questions regarding this correspondence, please feel free to contact me at (858) 292-3680.

Sincerely,



Bob Nicholson  
Senior Director, Facility Planning Services

Cc: Bryan Ehm, Facility Planning Coordinator, SDCOE  
Donna Knott, Program Business Specialist, SDCOE



401 B Street, Suite 800  
San Diego, CA 92101-4231  
(619) 599-1900  
Fax (619) 599-1905  
www.sandag.org

February 17, 2005

Mr. Tracy Reed  
City of San Diego Redevelopment Agency  
600 B Street, Fourth Floor  
MS 904  
San Diego, CA 92101-4506

Dear Mr. Reed:

Thank you for the opportunity to review the draft Environmental Impact Report (EIR) for the Grantville Redevelopment Project. SANDAG offers the following comments.

1. Please depict the Mission Valley East light rail line on Figures 4.1-1 and 4.2-5 through 4.2-9. Mission Valley East construction is nearly complete and operations will begin within the next several months.
2. The traffic analysis should assume a 5% trip reduction in automobile travel trips for the portions of the study area within easy access to the light rail station, since the rail line is completing construction and will be operational during the redevelopment area's 30-year time period.
3. The EIR should consider the potential for more intense land uses to develop within 1/4 to 1/3 mile of the new Grantville light rail station. Development of housing and mixed uses would create an opportunity for a greater transit mode share split, accommodation of the City's need for additional housing opportunities, and a chance to take advantage of the public's investment in the light rail line.

Please feel free to contact me if you have any questions about SANDAG's comments.

Sincerely,

TONI BATES  
Division Director of Transit Planning

TB/mk/mh

## RESPONSE TO COMMENT LETTER FROM SAN DIEGO ASSOCIATION OF GOVERNMENTS (SANDAG), SIGNED BY TONI BATES, DATED FEBRUARY 17, 2005

### Response to Comment SNDG1:

EIR Figure 4.1-1 Existing Land Uses provides an aerial photograph (2004) of the Project Area and depicts adopted Community Plan Land Use designations. The recently constructed trolley line is visible in this aerial photograph; however, Figure 4.1-1 has been modified to clearly depict the newly constructed trolley line. Additionally, Figures 4.2-1 through 4.2-9 have also been modified to depict the trolley line.

### Response to Comment SNDG2:

The Transportation/Circulation section of the EIR acknowledges the future operation of the Grantville trolley station within the Project Area. As discussed in the EIR, (EIR, page 4.2-9), "This new trolley stop will bring alternative transit opportunities to the project area. This transit opportunity will decrease the amount of vehicle trips generated by the redevelopment. However, the traffic analysis does not assume the five percent reduction for any of the study area. Therefore, the traffic analysis is a conservative estimate of traffic generated by the project."

### Response to Comment SNDG3:

The EIR analyzes a reasonable range of alternatives to the proposed project, including two alternatives that consider mixed-use land use opportunities in the vicinity of the trolley station. These alternatives include the "General Plan Opportunities Areas Map" and the "TOD Principals Alternative."

### Response to Comment SNDG4:

Comment noted.

SNDG1

SNDG2

SNDG3

SNDG4

#### MEMBER AGENCIES

City of  
Carlsbad

Chula Vista

Coronado

Del Mar

Escondido

Escondido

Imperial Beach

La Mesa

Lemon Grove

National City

Oceanside

Poway

San Diego

San Marcos

SanTEE

Solana Beach

Vista

and

County of San Diego

#### ISLAND MEMBERS

Imperial County

California Department

of Transportation

Metropolitan Transit System

North San Diego County

Transit Development Board

United States

Department of Defense

San Diego

United Post District

San Diego County

Water Authority

San Antonio/Mexico

City of San Diego  
M E M O R A N D U M

DATE: February 14, 2005

TO: Tracy Reed, Project Manager, Redevelopment Agency

FROM: Ann French Gonsalves, Senior Traffic Engineer, Development Services Dept.

SUBJECT: Grantville Redevelopment Area – Draft Environmental Impact Report

---

Thank you for the opportunity to review the above document dated December 13, 2004. We have the following comments:

AG1

**1. Page ES-4, Executive Summary:** The “Significant, Unavoidable Impacts” section states that the unmitigable impacts are “not a result of implementation of the Redevelopment Project in and of itself, rather they are a result of forecasted growth in the region”. This assertion is not supported by the traffic study since it does not contain a near term analysis or any other analysis of the project separate from the rest of the forecasted growth. Therefore, we suggest this sentence be changed to “These impacts are a result of implementation of the Redevelopment Project combined with forecasted growth in the region”.

AG2

**2. Page ES-6, Table S-1, Summary of Significant Impacts and Mitigation Measures:** Under “Recommended Mitigation Measures”, additional potential mitigation should be considered such as the projects listed on page 4.2-11 (extension of Santo Road, extensions of Princess View Drive and Jackson Drive from the Navajo community into the Tierrasanta community), the extension of State Route 52 from State Route 125 to State Route 67 and improvements to the Interstate 8/Mission Gorge Road/Fairmount Avenue interchange.

AG3

**3. Page 5-3, Section S, Long Term Cumulative Impacts, Transportation/Circulation:** The last sentence of Section S.1.2, states that the “cumulative impact would remain significant and unavoidable”. This assertion has not been demonstrated in the document, except perhaps for segments of Mission Gorge Road. We suggest wording be changed to “cumulative impact would remain significant and unmitigated”.

**RESPONSE TO COMMENT LETTER FROM THE CITY OF SAN DIEGO,  
REDEVELOPMENT AGENCY, SIGNED BY ANN FRENCH GONSALVES, DATED  
FEBRUARY 14, 2005**

**Response to Comment AG1:**

The EIR statement that the impacts are a result of forecasted growth in the region is intended to indicate that the impact is largely cumulative, and includes both the project (existing community plan land uses) as well as regional growth. The EIR has been revised to clarify this conclusion as follows:

Page ES-4:

“Based on the data and conclusions of this Program EIR, the Redevelopment Agency finds that the project will result in significant and unavoidable impacts to the following resources areas:

- Transportation/Circulation
- Air Quality (Long-term Mobile Emissions)

Implementation of proposed Mitigation Measures will reduce the potential impact to these resources to the extent feasible; however, the impact will remain significant and unavoidable. These impacts are ~~not a result of implementation of the Redevelopment Project in and of itself, rather they are a result of implementation of the Redevelopment Project combined with~~ forecasted growth in the region, which will occur both inside and outside of the Project Area. If the Redevelopment Agency chooses to approve the Grantville Redevelopment Project, it must adopt a “Statement of Overriding Considerations” pursuant to Sections 15093 and 15126(b) of the CEQA Guidelines.

**Response to Comment AG2:**

The traffic analysis is considered conservative in that it only assumes improvements that are identified in the existing Navajo Community Plan. No other funded improvements have been identified in the project study area. As discussed in the EIR (EIR page 4.2-11), the extensions of Santo Road, Princess View Drive and Jackson Drive into the Tierrasanta Community are identified in the Tierrasanta Community Plan, however there is currently no funding identified for these improvements. The extension of SR52 from SR125 to SR67 is a priority project identified in the recently approved Transnet extension. While potentially feasible, extension of these roadways are not funded, nor currently planned to be funded, and are therefore not considered as feasible at this time.

**RESPONSE TO COMMENT LETTER FROM THE CITY OF SAN DIEGO,  
REDEVELOPMENT AGENCY, SIGNED BY ANN FRENCH GONSALVES, DATED  
FEBRUARY 14, 2005 (cont.d)**

**Response to Comment AG2 (cont.d):**

Please refer to response to comment DOT3 regarding improvements to the Interstate 8/Mission Gorge Road/Fairmount Avenue Interchange.

It is recognized that these improvements may be feasible and would likely improve circulation in the study area. The EIR does not preclude the implementation of these improvements if considered by the City in the future.

**Response to Comment AG3:**

No mitigation measure has been identified in the context of this traffic analysis that would reduce the cumulative impact to a level less than significant. The EIR concludes that the impact would be significant and unavoidable, which is consistent with the significant and unmitigable terminology suggested by the commentor. However, no additional changes to the EIR text is proposed.



**RESPONSE TO COMMENT LETTER FROM THE CITY OF SAN DIEGO,  
REDEVELOPMENT AGENCY, SIGNED BY ANN FRENCH GONSALVES, DATED  
FEBRUARY 14, 2005 (cont.d)**

**4. Page 8-3, Section 8.1 No Project/No Redevelopment Alternative.**

**Transportation/Circulation:** Section 8.1.1.2 should be modified to clearly state that the reason the No Project Alternative Transportation Impact would be expected to be greater than the proposed project impact is that the No Project Alternative assumes that no transportation infrastructure would be built.

AG4

**5. Page 8-10, Section 8.3 General Plan Opportunity Areas Map Alternative.**

**Transportation/Circulation:**

- A. The project trip generation for this alternative should be rechecked to utilize the appropriate transit reductions from the City's *Traffic Impact Study Manual* (July 1998). For example, for development within 1500 feet walking distance from a transit station, daily reductions of 5% for residential, 5% for industrial and 3% for office development can be applied.
- B. Figure 8-1, General Plan Opportunities Area Map Alternative Land Uses, should be revised to show the existing and planned trolley route and station locations.

AG5

**6. Appendix B, Traffic Impact Analysis:** Some of the base assumptions in the analysis should be rechecked, as they could affect the conclusions. For example:

- A. Segments of Mission Gorge Road which are four lanes existing but have no raised median and numerous driveways should be given a capacity of 30,000 average daily trips (ADT) (not 40,000 ADT).
- B. Existing queues must be considered in evaluating existing intersection level of service during peak periods.

AG6



Ann French Gonsalves, P.E.  
Senior Traffic Engineer

**Response to Comment AG4:**

Page 8-3 of the EIR has been revised as follows:

In the horizon year, traffic operations at study area segments and intersections are anticipated to be unacceptable, and the proposed project would incrementally add to these conditions – which would also occur under this alternative. Overall, the transportation/circulation impact is expected to be greater than the proposed project, *as this alternative assumes buildout of the Project Area according to adopted land uses, but assumes that no additional transportation infrastructure would be constructed.*

**Response to Comment AG5:**

**Item A.** The trip generation utilized in the traffic analysis does not account for any potential reductions or credits for land uses in proximity to public transit. The EIR recognizes that the Grantville Trolley Station is under construction and will be in service to the Project Area soon (e.g., see EIR page 4.2-9). The traffic analysis is considered a conservative estimate of trip generation because it does not assume any trip generation reductions.

**Item B.** Several EIR figures, including Figure 8-1 as referenced by the commentor, have been revised to depict the trolley line and location of the trolley station within the Project Area.

**Response to Comment AG6:**

**Item A.** The traffic analysis assumes that Mission Gorge Road from Interstate 8 north to Friars Road has a functional capacity of a 4-Lane Major (LOS E capacity of 40,000). This roadway has a two-way left-turn lane for its entire length. While there are numerous driveways, it functions more like a 4-Lane Major, which has two dedicated lanes in each direction that are free from turning vehicles (especially left-turning vehicles) than a 4-Lane Collector, whose inner lanes are often blocked by left turning vehicles.

**Item B.** The HCM methodology is the required method for determining level of service in the City of San Diego at intersections. This methodology does not take into account the resulting delay caused by queues; however, the calculation worksheets contained in the appendix of the traffic study show the resulting queues at intersections.

CITY OF SAN DIEGO  
M E M O R A N D U M

DATE: January 26, 2004

TO: Tracy Reed, Project Manager Community and Economic Development  
Department

FROM: Barry Kelleher, Park Designer, Park Planning and Development  
Park and Recreation Department

SUBJECT: Grantville Redevelopment Survey Area – Draft Program Environmental  
Impact Report (DEIR)

PRD1

Park and Recreation Department staff has reviewed the DEIR and offers the following comments regarding park and recreation requirements associated with the affected communities.

PARK PLANNING AND DEVELOPMENT DIVISION

General Comments

The DEIR states in several locations that any new development will conform to the development requirements in the applicable Community Plan and the City's "Progress Guide and General Plan." The typical service area radius for a 5 to 10 acre neighborhood park is ½ mile. The redevelopment plan needs to plan locations for neighborhood parks within the ½ mile service radius from potential residential development sites in order to meet the recreation goals of the General Plan.

PRD2

Specific Comments

1) Page 2-5

PRD3

The section numbering is not correct. It appears that there needs to be a 2.3 "Community Plans" title. Also in this section, although it is in a draft form, the San Diego River Park Master Plan should be referenced.

2) Page 3-9

PRD4

Please note that the City has several classifications of park land. The Table 3.1 lists 68.92 acres of parks. This number needs to be broken down into resource-based parks, open space park area, and population-based park acreage. Population-based park acreage is generally suitable for active recreation (e.g multi-purpose fields, mini-parks etc.) Because they are intended to serve the city and region as a whole, open space and resource-based parks are not included in the population-based park acreage calculations required to meet the goals of the City's Progress Guide and General Plan.

**RESPONSE TO COMMENT LETTER FROM THE CITY OF SAN DIEGO, PARK  
PLANNING AND DEVELOPMENT, PARK AND RECREATION DEPARTMENT,  
SIGNED BY BARRY KELLEHER, DATED JANUARY 26, 2005**

**Response to Comment PRD1:**

Please refer to responses to comments PRD2 through PRD23.

**Response to Comment PRD2:**

Comment noted. The redevelopment plan is consistent with the adopted Community Plan land uses for the Project Area. As indicated on Figure 4.1-2 (EIR, page 4.1-13), parkland within the Project Area is currently developed with park uses. Pursuant to the City of San Diego Municipal Code, parks could also be constructed within several of the zones that are located within the Project Area, or any portion of the Project Area subject to approval of a community plan amendment and rezone. In zones IL-2-1 and IL-3-1, active recreation space is permitted. Active recreation space is a public park facility that requires major land development for installation, requires a high level of maintenance, and can accommodate large assemblages of people. In zones CC-1-3, CC-4-2, CO-1-2, and CV-1-1, open space facilities are not permitted. In zones AR-1-1, AR-1-2, and RM-3-7, all open space facilities are permitted except park maintenance facilities. As stated in Section 3.0 Project Description of the EIR, one objective of the Redevelopment Plan is to provide additional parkland (e.g. river park) that may not otherwise occur without redevelopment financing. Additional goals related to the provision of parkland and open space are provided in the Draft Redevelopment Plan (see Goals #11, #12, and #13).

**Response to Comment PRD3:**

EIR text page 2-5 has been modified to include a heading for Community Plans as follows:

2.3.3.1 Community Plans

Additionally, the following text has been added to EIR page 2-7:

2.4 Draft San Diego River Park Master Plan

The City of San Diego has prepared the Draft San Diego River Park Master Plan. This document is in draft, and has not been formally adopted by the City of San Diego. The Master Plan is a comprehensive planning document and outlines goals and objectives for the development of the San Diego River Park.

**RESPONSE TO COMMENT LETTER FROM THE CITY OF SAN DIEGO, PARK  
PLANNING AND DEVELOPMENT, PARK AND RECREATION DEPARTMENT,  
SIGNED BY BARRY KELLEHER, DATED JANUARY 26, 2005 (cont.d)**

**Response to Comment PRD4:**

Table 3-1 (EIR page 3-9) and Table 4.1-1 (EIR page 4.1-4) depict general categories of land uses in the Project Area, including parkland. The 68.92 acres of parkland in the Project Area consists of approximately 23.7 acres of population-based parks, and approximately 45.22 acres of resource-based and open space park area. Tables 3-1 and 4.1-1 have been amended to include a footnote that indicates the acreage amounts of population-based parks and resource-based parkland in the Project Area, as follows:

<sup>1</sup> The 68.92 acres of parkland in the Project Area consists of 23.7 acres of population-based parks (Lewis middle school and ballfields), and 45.22 acres of resource-based and open space park area.

PRD5

3) Page 3-10  
Section 3.4.1 - Please add language addressing the creation of livable communities including active recreation areas and park lands sufficient to provide a variety of active and passive recreation opportunities for the existing and future residents.

PRD6

3) Page 3-14  
Section 3.6.1.4 - The Draft San Diego River Park Master Plan is its own document and not a part of the Navajo Community Plan. Please provide a section for its discussion.

PRD7

5) Page 4.1-3  
The document does not adequately address existing active recreation park acreage deficiencies for residents in these communities. For example, the Navajo Community Planning Area currently has an "active recreation" park acreage deficit of nearly 21 acres, projected to reach almost 27 acres by the year 2030. This redevelopment plan is an opportunity to increase the total acreage dedicated for public recreation, and reduce this deficit. The discussion of the redevelopment needs to consider public recreation areas as catalysts for revitalization of a community, and public parks as an essential element of sustainable, livable communities.

PRD8

6) Page 4.1-4  
Table 4.1-1 - Please refer to comment #2.

PRD9

7) Page 4.1-9  
Sections 4.1.15 - Some of the major goals of the San Diego River Park are to widen the river corridor to help address water quality issues, habitat preservation and provide for a viable wildlife corridor. This should be mentioned in this section. Also, the San Diego River Park Master Plan is proposing surfacing Alvarado Creek drainage and creating a strong open space link between Alvarado Canyon and the San Diego River. The second sentence in the second paragraph does not make that clear.

PRD10

8) Page 4.1-16  
Section 4.1.3.6- To say that "All of the areas included in the MSCP are designated as park..." is not accurate. Population-based parks (developed parks used for active recreation) would not be included in the MSCP.

PRD11

9) Page 4.6-2  
Giant Reed - please double check the "approximate 1.6 acres of giant reed". This seems to fall well short of what is existing within the Grantville Redevelopment District.

PRD12

10) Page 4.6-18  
The last paragraph of this section states that the SD River is an important wildfire corridor. That is correct. However, the corridor is highly constricted in some areas due to impacts from existing land use, (ie Superior Mines). Please evaluate if additional restoration/enhancement opportunities are available within Subareas A and B. Include any additional sites within Section 4.6.5.2 and on Figure 4.6-2.

## RESPONSE TO COMMENT LETTER FROM THE CITY OF SAN DIEGO, PARK PLANNING AND DEVELOPMENT, PARK AND RECREATION DEPARTMENT, SIGNED BY BARRY KELLEHER, DATED JANUARY 26, 2005 (cont.d)

### Response to Comment PRD5:

The EIR identifies the overall objectives of the proposed project. These project objectives have been further refined by the Grantville Redevelopment Area Committee and are provided within the Draft Redevelopment Plan. The objectives address various aspects of the creation of livable communities including improving public infrastructure, creating additional walkways and paths for proper pedestrian, bicycle and/or vehicular circulation (Goal #3), creation of an attractive and pleasant environment through streetscape enhancements (Goal #5), explore opportunities for development of mixed residential and commercial uses particularly transit-oriented development to take advantage of the nearby multi-modal transit system (Goal #8), and expand community serving recreational opportunities through rehabilitation and expansion of existing park and recreational facilities as well as addition park and recreation facilities (Goal #12).

### Response to Comment PRD6:

EIR page 3-14 lists applicable goals of the Navajo Community Plan, which includes reference to the River Park.

### Response to Comment PRD7:

The Redevelopment Agency recognizes that parkland deficiencies exist within the Navajo Community. There is no specific parkland deficit within the Project Area as there are no residential uses. The existing land use description provided on EIR page 4.1-3 is a description of existing land uses within the Project Area, not the Navajo Community as a whole. However, EIR page 4.1-8 has been modified to describe the current deficiency of parkland within the Navajo Community. The modified text reads as follows:

The City of San Diego Parks and Recreation Department indicates that the Navajo Community Planning Area currently has an "active recreation" park acreage deficit of nearly 21 acres, which is projected to reach almost 27 acres by the year 2030.

Please also refer to response to comment PRD5.

### Response to Comment PRD8:

Please refer to response to comment PRD4.

**RESPONSE TO COMMENT LETTER FROM THE CITY OF SAN DIEGO, PARK PLANNING AND DEVELOPMENT, PARK AND RECREATION DEPARTMENT, SIGNED BY BARRY KELLEHER, DATED JANUARY 26, 2005 (cont.d)**

**Response to Comment PRD9:**

Several of the goals of the Draft Redevelopment Plan, as summarized in response to comment PRD5, are consistent with the goals of the Draft San Diego River Park Master Plan.

The text on EIR page 4.1-9 has been modified to read:

Planning recommendations were created as part of the Draft Master Plan. Recommendations relevant to the Redevelopment Area include coordinating with the proposed Grantville Redevelopment to preserve additional open space along the river and at the confluence with Alvarado Creek, surfacing the Alvarado Creek drainage, and creating a strong open space link between Alvarado Canyon and the San Diego River; engage Navy planners and collaborate with redevelopment of the Superior Mine to create a continuous multi-use trail near river; and, collaborate with redevelopment of Superior Mine to create a historic interpretation zone within development.

**Response to Comment PRD10:**

The EIR text on page 4.1-16 has been modified to read:

With the exception of one parcel (APN 456-011-10), All of the areas included in the MSCP are designated as park (i.e., resource-based park) or open space land uses in the Navajo and Tierrasanta Community Plans. The exception parcel is a portion of city-owned designated open space that is included in the MSCP, but is designated as single-family residential in the Navajo Community Plan.

Please also refer to comment PRD20 (see City Parks Department comment letter – comment PRD20), which also provides further clarification regarding this parcel.

**Response to Comment PRD11:**

The acreage amount of giant reed shown for the redevelopment Project Area is based on the amount of giant reed observed and recorded in the Project Area during biological surveys of the Project Area as part of the preparation of the EIR. As recognized in the EIR, giant reed is a California Department of Fish and Game listed noxious weed and is listed by the California Invasive Plant Council as a List A-1 "Most Invasive Wildland Pest Plant." A majority of this species is located within the privately-owned unimproved portion of Alvarado Creek within the Project Area as shown on Figure 4.6-1. Any flood control improvements within this area would likely have a beneficial effect as this noxious plant would be removed, decreasing the potential for further spreading downstream and into the San Diego River.

**RESPONSE TO COMMENT LETTER FROM THE CITY OF SAN DIEGO, PARK  
PLANNING AND DEVELOPMENT, PARK AND RECREATION DEPARTMENT,  
SIGNED BY BARRY KELLEHER, DATED JANUARY 26, 2005 (cont.d)**

**Response to Comment PRD12:**

Comment noted. It is recognized that the historical development around the San Diego River has restricted this wildlife corridor. While the EIR identifies potential mitigation opportunities, it is not the intent of the EIR to exhaustively identify all potential mitigation opportunities in the area. Additionally, it is recognized that the San Diego River Park Master Plan also identifies potential areas for restoration of habitats and ways to enhance the existing corridor. EIR page 4.6-30 states, "There appears to be many opportunities to mitigate redevelopment impacts within the Project Area that would be consistent with the goals of the San Diego River Park." While potential mitigation opportunities are identified, mitigation opportunities are not limited to only those areas depicted in the EIR.

**PRD13**

11) Page 4.6-26  
Wildlife Corridor Impacts – Please refer to #10. Revise mitigation measure BR1 to incorporate the City's regulations regarding: (1) requirement to avoid impacts to wetlands first, and (2) requirements associated with wetland buffers.

12) Page 4.12-4  
Section 4.12.3.2 – It is stated that the redevelopment plan does not currently anticipate additional housing units beyond those which are cited in the current Navajo Community Plan. However, approximately 134 additional residential units are planned within the redevelopment area.

13) Page 4.13-1 Public Services and Utilities  
Population-based parks are considered a public service. It is not clear as to why it was not discussed in this section

The City of San Diego's "Progress Guide and General Plan" population-based park goals recommend 2.8 acres of active recreation area per 1,000 population. The required park acreage for new residential development will be calculated using the proposed number of units and the SANDAG figures on population per household (PPH) in the Community Planning Area (CPA).

**PRD14**

The calculation, using the most recent SANDAG population projections of 2.57 PPH in the year 2030, results in a requirement of almost 1.0 acre of new parkland suitable for active recreation to serve the future residents. In some cases, the City may accept fees in-lieu of land dedications in order to expand and improve existing facilities within the community where existing parks can serve the proposed development.

Although the redevelopment plan can not predict how demands will change and how market forces will affect the future, in the current market it would be appropriate to anticipate an increase of residential development within the Grantville neighborhood. For example, currently there is a preliminary development proposal for this area, involving a rezoning, proposing a mixed-use development including approximately 700 additional residential units. This development alone would generate the need for about 5 acres of active parkland to meet General Plan recreation goals. The redevelopment plan needs to consider potential locations for these facilities within the community

**PRD15**

14) Page 5-7  
5.1.13 – Please refer to comment #5.

**PRD16**

15) Page 7-1  
Section 7.2 – Yes, that is correct. However, please understand that natural parks and open space are not used to calculate population based park needs.

**RESPONSE TO COMMENT LETTER FROM THE CITY OF SAN DIEGO, PARK PLANNING AND DEVELOPMENT, PARK AND RECREATION DEPARTMENT, SIGNED BY BARRY KELLEHER, DATED JANUARY 26, 2005 (cont.d)**

**Response to Comment PRD13:**

The City's Environmentally Sensitive Lands Regulations (ESL) and Biology Guidelines require that:

The applicant shall solicit input from the Resource Agencies on impact avoidance, minimization, mitigation and buffer requirements, including the need for upland transitional habitat. The applicant shall, to the maximum extent feasible, incorporate the Resource Agencies' recommendations prior to the first public hearing. (Section 143.0141(a) of the ESL regulations).

A wetland buffer shall be maintained around all wetlands as appropriate to protect the functions and values of the wetland (Section 143.0141(b) of the ESL regulations, Section II, (a)(1)(b) of the Biology Guidelines).

All future redevelopment activities would be required to comply with these existing City regulations, and therefore, no additional mitigation language is proposed.

Please also refer to response to comment DFG5.

**Response to Comment PRD14:**

As stated in response to comment COE1, the Project Area does not contain existing residential uses, although two portions of the Project Area are designated in the Navajo Community Plan as residential land uses. The residentially designated land within the Project Area is currently developed with parkland, hotel, school, and commercial uses, and is not considered likely to redevelop to residential uses. However, assuming these parcels are redeveloped according to the adopted community plan land use, a total of 48 single-family dwelling units, and 86 multi-family residential dwelling units could be constructed. EIR page 7-1 has been modified to clarify this as follows:

**7.2 Parks and Recreation**

There are two parks located within the Redevelopment Project Area, the Allied Garden Community Park and Mission Trails Park. As part of the Redevelopment Project, these will remain park and recreation facilities. Furthermore, the Redevelopment Project will be consistent with the San Diego River Park Master Plan to develop a park along the San Diego River, in which portions of this park will be development within the Grantville Redevelopment Area. The development of this new park will increase the

**RESPONSE TO COMMENT LETTER FROM THE CITY OF SAN DIEGO, PARK  
PLANNING AND DEVELOPMENT, PARK AND RECREATION DEPARTMENT,  
SIGNED BY BARRY KELLEHER, DATED JANUARY 26, 2005 (cont.d)**

**Response to Comment PRD14 (cont.d):**

park and recreation uses within the Redevelopment Project Area. The Project Area does not contain existing residential uses, although two small portions of the Project Area are designated in the Navajo Community as residential uses. These uses are not likely to convert to residential, as the subject areas currently contain parkland, hotel, school, and commercial uses. However, assuming these parcels are redeveloped according to the adopted community plan land use, a total of 48 single-family dwelling units, and 86 multi-family residential dwelling units could be constructed. Therefore, the proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered facilities, rather it will act as an improvement to existing conditions.

Furthermore, as acknowledged in prior responses to comments (see responses to comments PRD2, PRD5, and PRD6) goals of the Redevelopment Plan include increasing the amount of recreational opportunities within the Project Area.

**Response to Comment PRD15:**

Please refer to response to comment PRD14.

**Response to Comment PRD16:**

Please refer to response to comment PRD14.



PRD17

16) Page 8-9  
Section 8.3.1 – The second paragraph discusses increases and decreases of land uses. Please refer to previous comments about population-based park needs for residential developments. Per this alternative, utilizing SANDAG numbers, per comment #13, there would be a need of approximately 22 acres of developed park to satisfy the increase of residents.

PRD18

16) Page 8-11  
The General Plan Opportunities Area Map Alternative Land Uses does not appear to address the goals of the San Diego River Park Master Plan. Examples include the percentage of parcel development along the San Diego River south of Friars Road bridge and the exclusion of any open space for the Alvarado Creek connection.

OPEN SPACE DIVISION

PRD19

1) Page ES-2  
Executive Summary Project Location Subarea B  
Please note that Subarea B includes a portion of MTRP and city-owned designated open space. Be advised that parcel 373-040-18 JJB Land Company is drawn incorrectly on SanGIS and should not extend onto MTRP. This error puts the project boundaries within MTRP dedicated open space. Please contact the City of San Diego Real Estate Assets Department for clarification on this parcel.

PRD20

3) Page 4.1-16  
Multiple Species Conservation Program  
Report says 'All the areas included in the MSCP are designated as park or open space land uses in the Navajo and Tierrasanta Community Plans.' However, there is a portion of city-owned designated open space that is included in the MSCP but is designated as Single-Family Residential in the Navajo Community Plan. See APN 456-011-10.

PRD21

4) Page 4.6-25  
Figure 4.6-3-C8  
Please include that C8 is within city-owned open space.

PRD22

5) Page 4.6-25  
Figure 4.6-3-C8 and 4.1-16 Multiple Species Conservation Program  
Report says 'All the areas included in the MSCP are designated as park or open space land uses in the Navajo and Tierrasanta Community Plans.' Report also says '(There) is a large slope with Diegan Coastal Sage Scrub/Chaparral within the MHPA that is designated as Single Family Residential housing in the Community Plan Land Use.' These lines are conflicting and should be revised.

PRD23

6) Page 4.6-31 B. Subarea B Paragraph 5  
Please include that O5 is within city-owned open space and therefore any removal or plantings would need to be reviewed by Open Space Division staff.

**RESPONSE TO COMMENT LETTER FROM THE CITY OF SAN DIEGO, PARK PLANNING AND DEVELOPMENT, PARK AND RECREATION DEPARTMENT, SIGNED BY BARRY KELLEHER, DATED JANUARY 26, 2005 (cont.d)**

**Response to Comment PRD17:**

The EIR recognizes that the implementation of this alternative would result in the generation of residential units that generate a population-based parkland demand of 22 acres. Please refer to EIR page 8-22, Section 8.3.1.13 Public Services and Utilities, which states, "Additionally, this alternative would place a demand on parkland that would not occur under the proposed project. Based on City General Plan recommended parks to population ratio (approximately 20 acres/1,000 people), this alternative would generate a demand for approximately 22 acres of population-based parkland."

**Response to Comment PRD18:**

As noted on EIR page 8-9, the General Plan Opportunity Areas Map Concept anticipates land uses that would generally implement the conceptual land use patterns identified in the City of San Diego General Plan (City of Villages) Opportunity Areas Map for the Project Area. It is recognized that any future planning efforts within the Project Area will need to comply with the applicable land use plans as adopted by the City. In the event the River Park Master Plan Concept is adopted by the City, future development projects would need to be evaluated for consistency with the adopted plans, including any applicable standards adopted as part of the Master Plan such as the allowed percentage of parcel development along the San Diego River south of Friars Road and the incorporation of the Alvarado Creek connection as open space.

**Response to Comment PRD19:**

EIR figures have been modified to depict the correct boundary of Parcel # 373-040-18 and so as not to extend onto MTRP/City open space.

**Response to Comment PRD20:**

Please refer to response to comment PRD10.

**Response to Comment PRD21:**

EIR page 4.6-25 text has been modified as follows:

Within the area labeled 'C8', near the boundary with Mission Trails Regional Park, is a large slope with Diegan Coastal Sage Scrub/Chaparral within the MHPA that is designated as Single Family Residential housing in the Community Plan Land Use. Although designated as Single Family Residential in the Navajo Community Plan, this parcel is a portion of city-owned designated open space.

cc: Ann Hix, Deputy Director, Open Space Division  
Deborah Sharpe, PO II, Park Planning and Development Division,  
Jeff Harkness, Park Designer, Park Planning and Development Division,  
Paul Kilburg, Senior Planner, Open Space Division

**RESPONSE TO COMMENT LETTER FROM THE CITY OF SAN DIEGO, PARK  
PLANNING AND DEVELOPMENT, PARK AND RECREATION DEPARTMENT,  
SIGNED BY BARRY KELLEHER, DATED JANUARY 26, 2005 (cont.d)**

**Response to Comment PRD22:**

Please refer to responses to comments PRD10 and PRD21.

**Response to Comment PRD23:**

The EIR identifies potential mitigation sites; however, it is acknowledged that in some instances, certain sites identified may be constrained by other regulatory aspects. EIR text page 4.6-31 has been modified as follows:

Another 'Key Site' identified in the San Diego River Park Master Plan that can be incorporated into mitigation for redevelopment impacts are the Disturbed Habitats in, and adjacent to, Superior Mine ('O5')(Figure 4.6-3). Opportunities include acquiring habitat for enhancement and/or protection or removal of non-native, invasive species within native habitats. Site O5 is located within city-owned open space and therefore any removal or plantings would need to be reviewed by Open Space Division staff. These areas are within the MHPA.

**Grantville Redevelopment Project**  
**Comments on the Draft Environmental Impact Report (DEIR), Vol. 1**  
**Provided by the Tierrasanta Community Council**  
**14 February 2005**

**Topic: Environmental Setting, Areas of the Project within Tierrasanta**

§ 2.3.3.2 (pg 2-6): The DEIR states the portion of the Tierrasanta Community within the Project Area is the sand and gravel quarry.

**Comment:** This is not the only part that lies within Tierrasanta and the Final EIR should reflect the other areas as well. As shown in Figure 3-3 (page 3-5) and elsewhere, there are two other sections of the Project Area that lie within Tierrasanta:

- A small triangular section in the heart of Admiral Baker located at the NW edge of Subarea B and lying about 315' from the center of Subarea C
- A small parallelogram section in Admiral Baker just north of Friars Rd at the NW edge of Subarea A and due west from the center of Subarea C.

§ 4.12.1.1 (pg 4.12-2): This error is repeated in subpara C, "Community Plan Areas".

**Topic: Project Description, Size of the Project Area within Tierrasanta**

§ 3.1 (pg 3-1): The Project Area is listed as being 970 acres in size.

§ 3.2 (pg 3-4): The Project Area is described as being 18% within in the Tierrasanta Community Plan area. This suggests 175 acres of the Project Area are within Tierrasanta.

§ 3.6.2 (pg 3-14): About 130 acres of the sand and gravel quarry site are said to fall within the jurisdiction of Tierrasanta, and it is clear that all quarry land in Tierrasanta was included in the Project Area.

Fig 4.1-1 (pg 4.1-5): The figure shows the vast majority of the northern end of Subarea B in the Tierrasanta area to be quarry related, but there are two other areas near the terminus of Tierrasanta Blvd shown as: parks (open space) and undeveloped (vacant), both of which include sections of the San Diego River.

**Comment:** The discrepancy between 130 acres and 175 acres does not seem to be explained by these two small parcels where the river flows. Request these figures be verified for the Final EIR.

**Topic: Project Description, Tierrasanta Community Plan**

§ 3.6.2.1 (pg 3-14): The two bulleted items are inexact quotes from the Tierrasanta Community Plan.

**Comment:** The wording of these bullets should be identical to that of the referenced Community Plan. The first bullet is close but not quite a complete representation of paragraph 9 on page 56 of the Tierrasanta Community Plan. The second bullet is missing the second sentence of paragraph 2 on page 55 of the Tierrasanta Community Plan, which reads: "Clustered development should then be used to avoid development impacts on the designated open space."

**RESPONSE TO COMMENT LETTER FROM THE TIERRASANTA COMMUNITY COUNCIL, DATED FEBRUARY 14, 2005**

**Response to Comment TCC1:**

The commentor is correct. The Project Area includes four separate areas that are part of the Tierrasanta Community Plan. The EIR figures correctly depict the boundary of the Project Area in the context of the Tierrasanta Community Plan. The total Tierrasanta Community Plan portion of the Project Area is approximately 98 acres. EIR text on pages 2-6, 3-4, 3-14 and 4.12-2 of the EIR have been modified as follows:

EIR page 2-6:

The majority of the Redevelopment Project Area, approximately 88 percent, is located within the Navajo Community Plan Area.

Approximately 11.18 percent of the Redevelopment Project Area is located within the Tierrasanta Community Plan Area. The main portion of the Tierrasanta Community within the Project Area is designated as sand and gravel (approximately 82.80 acres) and open space (approximately 6.43 acres). There are two other smaller portions of the Project Area located within the Tierrasanta Community. These consist of a small triangular section (approximately 2.68 acres) located within Admiral Baker within Subarea B and a linear strip (approximately 6.02 acres) located within Admiral Baker within Subarea A. These two pieces are both designated as commercial recreation.

EIR page 3-4:

The proposed Grantville Redevelopment Project lies within the boundaries of three such community plans; the Navajo Community (88.82%), the Tierrasanta Community (11.18%), and the College Area Community Plans (less than 1%).

EIR page 3-14:

Please refer to response to comment TCC5.

EIR page 4.12-2:

The Project Area includes the Navajo, Tierrasanta, and College Area Community Plan areas. Only a very small portion of the Project Area lies within the College Area Community Plan areas and the portions of the Project Area located within Tierrasanta is designated as sand and gravel and open space.

TCC1

TCC2

TCC3

**RESPONSE TO COMMENT LETTER FROM THE TIERRASANTA COMMUNITY COUNCIL, DATED FEBRUARY 14, 2005 (cont.d)**

**Response to Comment TCC2:**

Please refer to response to comment TCC1.

**Response to Comment TCC3:**

EIR page 3-14 has been modified to reflect the exact language as provided in the Tierrasanta Community Plan as follows:

- Upon termination of the sand and gravel operations, the excavated area should be rehabilitated and a pathway to Mission Trails park ~~be~~ provided. Any other use of the property beyond open space uses will require an amendment to ~~the~~ this plan. (page 56)
- Designated open space areas which are not to be acquired by the City should be allowed to apply the adjacent residential density for development purposes. Clustered development should then be used to avoid development impacts on the designated open space. (page 55)

TCC4

**Topic: Project Description, Development Potential (Industrial Development)**

§ 3.3.3 (pg 3-8): "It is estimated that ... industrial development would be increased by 6,145,342 square feet"

§ 3.4.1 (pg-3-10): Stated objective: "encouraging the development of manufacturing enterprises."

**Comment:** Per Table 3-1 (pg 3-9), this is a quadrupling of industrial development from what exists today. Such development clearly would result in significant, unavoidable impacts in Transportation & Circulation and Air Quality (long-term), as is predicted in the DEIR, but contrary to the DEIR there is no predicted significant and unavoidable long-term impact to Noise.

It seems extremely likely there also will be significant and unavoidable Noise impact to the community of Tierrasanta. This probably is not predicted in the DEIR because nowhere in the document is there mention of the atmospheric anomaly that typically occurs in the morning hours when the air is cool and still: a form of sound ducting commonly exists that carries noises from the south side of Admiral Baker all the way to Tierrasanta (example: backing bells on cement mixers). The mitigations proposed in § 4.4.5 (pg 4.4-15) will need to address this phenomenon as the added 6 million square feet of light industry adds to what exists today.

**Topic: Land Use, Stated Goals of the Tierrasanta Community Plan (1982)**

§ 4.1.1.3 (pg 4.1-8): Subpara B says "Goals applicable to the proposed project are described in Section 2.3 and Section 3.6 of this EIR."

**Comment:** Not all goals applicable to the proposed project are described in the referenced sections. The Tierrasanta Community Plan is full of goals and recommendations on the future development of Tierrasanta, but Section 3.6 of the DEIR only includes two such goals and Section 2.3 of the DEIR includes none (but § 4.14.1.2, Subpara C on pg 4.14-4 quotes three goals related to the mine operation). Appearing below are a few more of the goals that pertain are (listed references are to the Tierrasanta Community Plan document):

- Paragraph 1 on page 48: "With the exception of sand and gravel extraction, only park related uses should be allowed within the adopted regional park boundaries."
- Paragraph 2 on page 48: "Future urban land use for all areas that abut the park should be sensitive to it, as proposed within the Urban Design Element of this plan." (Mentioned in § 4.10.1.1 and § 4.10.5.)
- Goal on page 54: "Establish an open space system which protects the natural resources, provides for the managed production of resources, provides outdoor recreation and enhances the identity and character of the community."
- Paragraph 6 on page 55: "Landscaped transition areas should be established between the developed urban areas and the open space system, along traffic corridors, and at canyon overlooks, where considered appropriate."
- Goal on page 61: "To create a functional, affordable, efficient and diverse suburban environment which is esthetically pleasing and sensitive to the natural environment."
- Goal on page 62: "To protect the assets of Mission Trails Regional Park from degradation by surrounding development." (Mentioned in § 4.10.1.1 on pg 4.10-3).
- Bulleted objective on page 90: "To minimize disruption to the community and its neighborhoods by through traffic."

TCC5

**RESPONSE TO COMMENT LETTER FROM THE TIERRASANTA COMMUNITY COUNCIL, DATED FEBRUARY 14, 2005 (cont.d)****Response to Comment TCC4:**

Comment noted. The EIR provides a comprehensive analysis of potential noise impacts, including potential stationary noise associated with industrial-related uses (see EIR pages 4.4-7 through 4.4-11, and 4.4-14). Mitigation Measure N2 is proposed so that the noise compatibility of redevelopment activities will be addressed on a case-by-case basis as specific redevelopment activities are proposed. Additionally, all redevelopment activities are required to comply with City of San Diego sound level limits as identified in Table 4.4-1 of the EIR. Compliance with Mitigation Measure N2 and City sound level limits would ensure no significant noise impact as a result of future redevelopment activities.

**Response to Comment TCC5:**

EIR page 3-14 has been modified to reflect the additional goals suggested by the commentor as follows:

**3.6.2 The Tierrasanta Community Plan**

Approximately 130 acres of sand and gravel operations fall under the jurisdiction of the Tierrasanta Community Plan, which was adopted in 1982. There are three non-contiguous areas located within the Project Area that are part of the Tierrasanta Community Plan. These include the sand and gravel processing area, and two smaller pieces that are part of the Admiral Baker Golf Course and are designated as open space. The sand and gravel processing area is isolated from the Tierrasanta community at its southeastern corner and has been designated as Open Space with a sub-designation of sand and gravel open space by the Tierrasanta Community Plan. The following identifies goals and recommendations related to future development in Tierrasanta:

**3.6.2.1 Open Space**

- Upon termination of the sand and gravel operations, the excavated area should be rehabilitated and a pathway to Mission Trails be provided. Any other use of the property beyond open space uses will require an amendment to the plan.
- Designated open space areas which are not to be acquired by the City should be allowed to apply the adjacent residential density for development purposes.
- With the exception of sand and gravel extraction, only park related uses should be allowed within the adopted regional park boundaries.
- Future urban land use for all areas that abut the park should be sensitive to it, as proposed within the Urban Design Element of this plan.

**RESPONSE TO COMMENT LETTER FROM THE TIERRASANTA COMMUNITY COUNCIL, DATED FEBRUARY 14, 2005 (cont.d)**

**Response to Comment TCC5 (cont.d):**

- Establish an open space system which protects the natural resources, provides for the managed production of resources, provides outdoor recreation and enhances the identity and character of the community.
- Landscaped transition areas should be established between the developed urban areas and the open space system, along traffic corridors, and at canyon overlooks, where considered appropriate.
- To create a functional, affordable, efficient and diverse suburban environmental which is esthetically pleasing and sensitive to the natural environment.
- To protect the assets of Mission Trails Regional Park from degradation by surrounding development.
- To minimize disruption to the community and its neighborhoods by through traffic.

TCC6

**Topic: Transportation/Circulation, Traffic Measurements & Predictions at Mission Gorge Road**

Fig 4.2-2 (pg 4.2-5):

Fig 4.2-3 (pg 4.2-6):

Fig 4.2-4 (pg 4.2-10):

**Comments:**

1. The orientation of the 4-quadrant trip-assignment circle at Jackson and Mission Gorge is correctly oriented in Fig 4.2-4, but appears to be 90° off in Fig 4.2-2 and Fig 4.2-3 (these need to be rotated clockwise a quarter turn). This presumes Mission Gorge is deemed East-West and Jackson is deemed North-South.
2. Given the above correction, what is the explanation in Fig 4.2-2 for 39 cars turning left from Mission Gorge eastbound? This seems unlikely since zero cars originate from Jackson heading southbound, an assessment derived from the fact there is no road segment heading southbound from Mission Trails Regional Park at Mission Gorge and Jackson.
3. Given the above correction, the same reasoning applies to Fig 4.2-3. What is the explanation for the following described traffic patterns given there is no road segment of Jackson north of Mission Gorge:
  - 32 cars turning left from Mission Gorge eastbound,
  - 2 cars turning right from Mission Gorge westbound,
  - 2 cars continuing straight through (northbound) from Jackson, or
  - 4 cars heading south on Jackson (2 straight through, one turning left and one turning right)?
4. Figure 4.2-4 appears to correctly show meaningful data at the intersection of Mission Gorge and Jackson: that zero cars will travel northbound from Mission Gorge at this intersection, and none will emerge heading southbound from the north at this intersection, because there is no road segment to turn into or emerge from.

Similar concerns apply to Fig 8-3 (pg 8-17) and Fig 8-4 (pg 8-18).

TCC7

**Topic: Transportation/Circulation, Traffic Measurements & Predictions at Mission Gorge Road**

Fig 4.2-2 (pg 4.2-5):

Fig 4.2-3 (pg 4.2-6):

Fig 4.2-4 (pg 4.2-10):

**Comment:** Though orientations are correct (and identical) in the figures listed to the left, the data in the 4-quadrant trip-assignment circles at Princess View & Mission Gorge is questioned. The northward extension of this intersection appears to enter into a quarry operation, so it is assumed this traffic is most likely trucks related to the mining operations. Why then do Figures 2 and 3 show traffic north of the intersection but Figure 4 shows no such traffic?

Fig 4.2-6 (pg 4.2-16):

Fig 4.2-7 (pg 4.2-17):

Fig 4.2-8 (pg 4.2-18):

Fig 4.2-9 (pg 4.2-19):

**Comments:**

1. The orientations of the 4-quadrant trip-assignment circles at Jackson and Mission Gorge are uncertain in light of the discussion above.
2. What is the explanation for traffic turning/heading northbound from Mission Gorge at Jackson, and what is the explanation for traffic heading southbound here? (continued)

**RESPONSE TO COMMENT LETTER FROM THE TIERRASANTA COMMUNITY COUNCIL, DATED FEBRUARY 14, 2005 (cont.d)****Response to Comment TCC6:**

- #1. The orientation of the existing turning movement figures (Figures 4.2-2 and 4.2-3) is incorrect; however the analysis is correct.

ElR Figures 4.2-2 and 4.2-3 have been revised to depict the correct orientation.

- #2. Existing traffic counts at this location were conducted manually for the traffic analysis. The left turns at this location could either be left-turns into a small parking lot for Mission Trails park, or, more likely, U-turns.
- #3. The north leg of this intersection is a popular parking spot for people using Mission Trails Regional Park. It is not surprising that the turning movement counts show vehicles entering and exiting this location.

The "Peak Hour Trip Assignment" graphics correctly display the project vehicles moving east and west along Mission Gorge Road. There are no trips entering or exiting the north leg of the intersection because there is no redevelopment on the north leg of the intersection; however, there is a small segment of road that dead-ends where people park to access Mission Trails Regional Park.

- #4. Comment noted and responded to in Items #1-3. The northbound and southbound turning movements in the AM peak hour General Plan Opportunities Area were also switched in the graphic. However, the analysis is correct.

**Response to Comment TCC7:**

- #1. As stated in response to comment TCC6, the orientation of the volumes at Jackson Drive and Mission Gorge Road should be rotated 90 degrees clockwise.
- #2. As stated in response to comment TCC6, the orientation of the volumes at Jackson Drive and Mission Gorge Road should be rotated 90 degrees clockwise. The northbound traffic at this location is heading in an easterly direction on Mission Gorge Road.
- #3. While the daily trips entering and exiting a project typically match (using trip generation tables), the AM and PM peak hour entering and existing volumes do not necessarily equal one another.

TCC7  
(cont'd.)

3. Why do the number of vehicles entering the quarry operation at Princess View in each of these figures not equal the number of vehicles exiting this quarry operation?

TCC8

**Topic: Map Depictions, Connection of Tierrasanta Roads to Mission Gorge Road and Jackson Drive**

§ 4.2.3.5 (pg 4.2-11): **Comment:** The DEIR, § 4.2.3.5, accurately reflects Tierrasanta's intention not to connect existing roads across the San Diego River or into Mission Trails Regional Park (final paragraph in "Planned Improvements"), and it correctly states that such connections are not included in the analysis.  
Fig 4.4-1 (pg 4.4-6):  
Fig 4.4-2 (pg 4.4-8):  
Fig 4.4-3 (pg 4.4-12): Unfortunately, the several figures listed to the left all show some of the proscribed road connections. These drawings should be corrected to more accurately reflect the DEIR's statement made in § 4.2.3.5.  
Fig 4.8-1 (pg 4.8-3):  
Fig 4.11-2 (pg 4.11-4):  
Fig 8-1 (pg 8-11):

TCC9

**Topic: Air Quality, Aluminum as an additional Quarry-Related Air Pollutant**

Table 4.3-3 (pg 4.3-7): Aluminum is not listed as an air pollutant although this is known to exist around the quarry.

**Comment:** The Final EIR should include airborne Aluminum dust as a relevant health concern resulting from quarry operations.

TCC10

**Topic: Air Quality, Mitigation Measures for construction-related impacts to Air Quality**

Table 4.3-5 (pg 4.3-11): Projected long-term air pollutant emissions, where levels of CO (carbon monoxide), ROG (reactive organic gases), NOx (nitrogen dioxide) and PM<sub>10</sub> (fine particulate matter) are projected to exceed the existing "significance threshold" values for these pollutants.

§ 4.3.5 (pg 4.3-14): List of mitigation measures to control short-term impact on air quality.

**Comment:** Table 4.3-5 predicts levels of CO will exceed the listed significance threshold by 800%, and it predicts levels of PM<sub>10</sub> will exceed the significance threshold by 1,100%. Thresholds of other pollutants are predicted to *only* exceeded their significance thresholds by 200% to 300%. The DEIR lists in §4.3.5 a variety of mitigation measures, including: applying water to control dust, properly maintaining diesel-powered vehicles, washing off trucks leaving construction sites, replacing ground cover, speed limits on dirt roads, and the like. These are good, but the adjoining resident must know how to voice a concern when it appears the mitigations are being ignored (who to complain to when these measures are taken with undue reluctance). The Final EIR should provide guidance on how the public can compel the required actions by developers should the promised mitigations fail to be followed.

**RESPONSE TO COMMENT LETTER FROM THE TIERRASANTA COMMUNITY COUNCIL, DATED FEBRUARY 14, 2005 (cont'd)**

**Response to Comment TCC8:**

Comment noted. The maps utilized in the EIR are provided by SANGIS. As indicated by the commentor, the EIR does not assume that roadways would connect (e.g., Princess View) to cross the river into the Tierrasanta Community. Specifically, none of the figures in the traffic analysis show road connections at Tierrasanta/Princess View, Santo Road, or Jackson Drive. Furthermore, the traffic analysis does not assume any of these roadway connections.

EIR figures 4.4-1, 4.4-2, 4.4-3, 4.8-1, 4.11-2, and 8-1 have been modified in response to this comment to delete the appearance of these roadway connections.

**Response to Comment TCC9:**

EIR page 4.3-2 has been modified as follows:

**Aluminum emissions**

According to the San Diego Air Pollution Control District (APCD), the existing sand and gravel operation located within the Project Area generates aluminum emissions. An emissions inventory (calculation) is completed for each facility once every four years. According to the APCD, Superior Ready Mix (Canyon Rock) emitted 1,557 pounds of aluminum in 2001 (the last year that emissions were calculated for this facility). Emissions from this facility will be calculated again at the end of 2005. The emissions are calculated by identifying the tonnage of concrete (or gravel, etc.) produced the previous year and then calculating the emissions based on an emissions factor (from EPA, ARB, etc.). No actual monitoring is conducted because it would not be accurate for the site as it would include surrounding emissions (diesel, etc.). The toxics inventory has no limiting mechanism unless there is a significant health risk associated with it. OEHA does not have a limiting mechanism for aluminum. So, regardless of the amount of aluminum emitted by this facility per year, APCD would not consider it to be significant. According to APCD, aluminum emissions, in and of itself, is not a considered the significant health risk for this facility; however, other emissions (dust, diesel) are considered a hazard from this facility.

**Response to Comment TCC10:**

Table 4.3-5 depicts long-term air pollutant emissions associated with the generation of traffic and non-point sources for the generation of energy. Short-term air quality emissions as a result of construction activities will be evaluated on a case-by-case basis as specific redevelopment activities are proposed. EIR Mitigation Measure AQ1



**RESPONSE TO COMMENT LETTER FROM THE TIERRASANTA COMMUNITY COUNCIL, DATED FEBRUARY 14, 2005 (cont.d)**

**Response to Comment TCC10 (cont.d):**

requires the implementation of measures to control dust during construction operations. Mitigation Measure AQ1 will be included in the Mitigation Monitoring and Reporting Program (MMRP) adopted by the City. The MMRP will ensure compliance with the proposed mitigation measures, and is also available to the public for review. Also, an MMRP will be required for all future redevelopment activities requiring short-term air quality mitigation.

**RESPONSE TO COMMENT LETTER FROM THE TIERRASANTA COMMUNITY COUNCIL, DATED FEBRUARY 14, 2005 (cont.d)**

**Response to Comment TCC11:**

The term "UST" refers to Underground Storage Tank and the term "DEH" refers to Department of Environmental Health. EIR pages ES-13, 4.8-13 and 10-2 have been modified to define these acronyms as follows:

EIR page ES-13 and page 4.8-13 (Mitigation Measures HM2 and HM3):

HM2 Any underground storage tanks (USTs) that are removed during redevelopment activities shall be removed under permit by the Department of Environmental Health (DEH). The soil and groundwater within the vicinity of the USTs shall be adequately characterized and remediated, if necessary, to a standard that would be protective of water quality and human health, based on the future site use.

HM3 In the event that not previously identified underground storage tanks (USTs) or undocumented areas of contamination are encountered during redevelopment activities, work shall be discontinued until appropriate health and safety procedures are implemented. A contingency plan shall be prepared to address contractor procedures for such an event, to minimize potential for costly construction delays. In addition, either Department of Environmental Health (DEH) or the Regional Water Quality Control Board (RWQCB), depending on the nature of the contamination, shall be notified regarding the contamination. Each agency and program within the respective agency has its own mechanism for initiating an investigation. The appropriate program shall be selected based on the nature of the contamination identified. The contamination remediation and removal activities shall be conducted in accordance with pertinent local, state, and federal regulatory guidelines, under the oversight of the appropriate regulatory agency.

EIR page 10-2 (Glossary):

UST Underground Storage Tank

**Response to Comment TCC12:**

EIR page 4.10-3 recognizes that there are existing sources of nighttime light and glare in the Project Area which is produced by existing development. Any new development would need to comply with City of San Diego Ordinance 0-86-5 and Municipal Code Sections 142.0730 and 142.0740 regulating light and glare. Additionally, as noted in response to comment DFG7, development adjacent to the San Diego River would need to incorporate measures to minimize edge effects to the San Diego River corridor, including lighting. Any new development, including industrial

**Topic: Hazards & Hazardous Materials, Use of acronyms**

Pg ES-13: Uses the terms "UST" and "DEH" without explanation.

§ 4.8.1.3 (pg 4.8-1): Spells out both terms.

Glossary, § 10: Spells out DEH but not UST.

**Comment:** The acronyms UST and DEH are used in the Executive Summary but these are not explained. The Glossary is not uniformly complete. One must read §4.8 to learn the meaning of UST.

TCC11

**Topic: Aesthetics, Light and Glare produced by Industrial Development**

§ 4.10.1.2 (pg 4.10-3): "substantial light and glare is produced by ... vacant land and open space" (?)

§ 4.10.3.2 (pg 4.10-4): "The impact associated with an increase in light and glare is considered less than significant."

**Comment:** The earlier mention of an additional 6 million square feet of industrial development suggests the DEIR's conclusion (above) is flawed. The development of "vacant land and open space" into industrial development should be revisited in the Final EIR in terms of the impact of light and glare to the neighboring communities of southern Tierrasanta (and northern Allied Gardens).

TCC12

**Topic: Miscellaneous (leftovers from the Scoping Comments)**

The following were provided as scoping comments that do not appear to have been addressed. The Final EIR should provide the missing answers:

**Land Use:** The DEIR should explain the relationship between this Grantville "Program DEIR" and a subsequent project-specific DEIR that encompasses part of the Grantville project area? Will a project-specific DEIR be standalone, or will it be beholden to what's contained in the Grantville Program DEIR? If they in fact are interrelated, then which will have seniority?

**Land Use:** The DEIR should explain the height restrictions that apply to property within the redevelopment area and thus to building construction that may occur on this land.

**Cultural Resources:** The DEIR will require a confidential appendix (not released to the public) to address certain historic cultural resources that lie within the Grantville area and along the S.D. River.

**Biological Resources:** The DEIR should explain how existing bodies of water will (or will not) be protected by this project once they are included within the Grantville area boundary. Specifically, the two "settling ponds" along the San Diego River and south of Admiral Baker, created as a part of the Rock Quarry and resulting from gravel/sand/rock excavation, most likely support certain biologic needs for native species. It is not clear whether the DEIR will serve either to maintain these ponds or to ensure such ponds even will exist into the future.

**Aesthetics:** The DEIR should explain how and whether residents of Tierrasanta (particularly those to the south, with a view of the Grantville area) will be able to have input to project-specific developments that are wholly within the Navajo planning area. As above in "Noise," development in Navajo along the southern boundary of Tierrasanta, will have direct impact to Tierrasantans with a clear view of the Grantville project.

TCC13

**RESPONSE TO COMMENT LETTER FROM THE TIERRASANTA COMMUNITY COUNCIL, DATED FEBRUARY 14, 2005 (cont.d)**

**Response to Comment TCC12 (cont.d):**

development would be evaluated by the City for potential light and glare impacts as part of development and environmental review. Additionally, future development projects would be evaluated for consistency with River Park Master Plan, when adopted by the City.

**Response to Comment TCC13:**

**Land Use.** EIR page 1-2 describes the CEQA Guideline requirements for preparation of a Program EIR for the adoption of a redevelopment project area. EIR page 3-15 - Section 3.7 Intended Uses of the EIR, describes the various actions that may be covered by the Program EIR, subject to review under criteria as described in CEQA Guidelines Sections 15162 and 15163.

As stated on EIR page 1-2:

This document has been prepared as a Program EIR in accordance with Section 15168(a)(3) of the State CEQA Guidelines. Preparation of a Program EIR for this project is appropriate in light of Section 15180 of the CEQA Guidelines related to Redevelopment Projects. Section 15180 of the CEQA Guidelines states:

- (a) All public and private activities or undertakings pursuant to or in furtherance of a redevelopment plan constitute a single project, which shall be deemed approved at the time of adoption of the redevelopment plan by the legislative body. The EIR in connection with the redevelopment plan shall be submitted in accordance with Section 33352 of the Health and Safety Code.
- (b) An EIR on a redevelopment plan shall be treated as a program EIR with no subsequent EIRs required for individual components of the redevelopment plan unless a subsequent EIR or a supplement to an EIR would be required by Section 15162 or 15163.

The Program EIR addresses the potential environmental impacts associated with the adopted of the proposed Grantville Redevelopment Project Area. Similar to Program EIR's that are prepared for the adoption of Community Plans, the Grantville Program EIR provides a comprehensive analysis of potential impacts associated with redevelopment of the Project Area; however, no specific redevelopment project is proposed. All future redevelopment activities will need to be evaluated for compliance with the provisions of the California Environmental Quality Act. Depending on the size, nature, and scope of redevelopment activities, future CEQA documentation may consist of an exemption, a Negative Declaration or Mitigated

**RESPONSE TO COMMENT LETTER FROM THE TIERRASANTA COMMUNITY COUNCIL, DATED FEBRUARY 14, 2005 (cont.d)**

**Response to Comment TCC13 (cont.d):**

Negative Declaration, a Secondary Study (pursuant to the Procedures for Implementation of the California Environmental Quality Act and State CEQA Guidelines, July 1990), an Addendum, Subsequent or Supplemental EIR. A Subsequent or Supplement to an EIR would be required under Section 15162 or 15163.

**Land Use.** The current height restrictions according to existing zoning in the Project Area are as follows:

Zone	Maximum Structure Height
IL-2-1	None
IL-3-1	None
CC-1-3	45 ft
CC-4-2	60 ft
AR-1-1	30 ft
AR-1-2	30 ft
RM-3-7	40 ft
CO-1-2	60 ft
CV-1-1	60 ft

**Cultural Resources.** A confidential appendix to the cultural resources report has been prepared and is on file with the City of San Diego Redevelopment Agency. The confidential appendix is not provided to the public in order to protect cultural resources, as locations of sensitive cultural resource sites within one mile of the Project Area are depicted.

**Biological Resources.** The EIR identifies mitigation measures (see Mitigation Measures BR 1 through BR 8) that places certain protections on biological resources within the Project Area. Both ponds referenced by the commentor are located within areas designated as Open Space according to the existing Navajo Community Plan designation. No additional development was assumed for these areas as part of the development assumptions analyzed in the EIR, which is consistent with the intent of the Open Space designation of the Navajo Community Plan.

Additionally, as discussed in Section 4.6 Biological Resources, the settling ponds are mapped as Open Water and are surrounded by sensitive wetland habitats of riparian forest and southern willow scrub. These ponds, and land immediately surrounding, are located within the City of San Diego MSCP MHPA, and are subject to City of San Diego

**RESPONSE TO COMMENT LETTER FROM THE TIERRASANTA COMMUNITY COUNCIL, DATED FEBRUARY 14, 2005 (cont.d)**

**Response to Comment TCC13 (cont.d):**

MSCP regulations, and potentially U.S. Army Corps of Engineers, Department of Fish and Game and Regional Water Quality Control Board regulation depending on the type of activity proposed.

**Aesthetics.** Any future discretionary actions within the Project Area are subject to the public notification requirements pursuant to Section 112.0501-112.0509 of the San Diego Municipal Code. Additionally, future subsequent redevelopment activities will be evaluated by the appropriate community planning group where public input and comment is invited.